BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

JUL 1 8 2008

Mr. John Richardson
Environmental Superintendent
Rhodia, Inc., Baton Rouge Plant
P.O. Box 828
Baton Rouge, Louisiana 70821

Re: Rhodia, Inc.-Baton Rouge Facility
Draft Hazardous Waste Operating Permit
LAD008161234/Agency Interest No. 1314 /PER19980003

Dear Mr. Richardson:

Attached, is your copy of the Rhodia, Inc., Draft Hazardous Waste Permit Renewal, LAD 008161234-OP-1-RN-1, which incorporates language pertaining to the operation and maintenance activities for two boiler and industrial furnaces, seven storage tanks and four container storage areas at the Baton Rouge Facility. The draft permit will also contain provisions for four proposed storage tanks and four proposed container storage areas.

A comment period of forty-five (45) days will be allowed in order for the public to review and comment on this draft hazardous waste operating permit. A public hearing will also be scheduled at least forty-five (45) days after the date on which the public notice is given. The date, time and location of the public hearing and specific dates for the beginning and ending of the comment period are contained in the attached public notice.

Prior to taking a final action on the final permit, the Administrative Authority will consider all significant comments submitted on this action. Written comments must be submitted no later than 12:30 p.m. on the final day of the comment period. The issuance of the final permit decision will be in accordance with LAC 33:V.705.

Please reference your Agency Interest Number 1314, EPA Identification Number LAD008161234, and Permit Activity Number PER19980003 on all future correspondence pertaining to this issue. Should you have any questions concerning this matter, please contact Mr. Will F. Steele of the Waste Services Section at (225) 219-3134.

Sincerely,

Bijan Sharafkhani, P.E.
Administrator
Waste Permits Division

wfs

Attachment

c. Kishor Fruitwala-EPA Region 6

DRAFT
HAZARDOUS WASTE
OPERATING PERMIT

RHODIA, INC.
BATON ROUGE FACILITY
AGENCY INTEREST 1314
PER19980003

PUBLIC RECORD COPY

FACT SHEET

FACT SHEET

FOR THE DRAFT HAZARDOUS WASTE OPERATING PERMIT RENEWAL
PREPARED FOR

Rhodia, Inc.
Baton Rouge Facility

EPA ID# LAD 008161234
Agency Interest # 1314

1275 Airline Highway
Baton Rouge, Louisiana
East Baton Rouge Parish

Permit Number LAD 008161234-OP-RN-1
PER19980003

I. INTRODUCTION

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft hazardous waste permit for Rhodia, Inc., Baton Rouge Facility, 1275 Airline Highway, Baton Rouge, Louisiana, East Baton Rouge Parish, 70805.

The Louisiana Department of Environmental Quality (LDEQ) has prepared this proposed draft hazardous waste permit which addresses the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA).

Rhodia is seeking to renew its RCRA operating permit for two boiler and industrial furnace units, seven aboveground storage tanks, and four container storage areas for direct burn and unloading. The draft permit renewal will also contain provisions for four proposed storage tanks and four proposed container storage areas for direct burn, unloading and staging.

II. THE PERMITTING PROCESS

The purpose of this fact sheet is to initiate the permitting decision process. The LDEQ, Office of Environmental Services, Waste Permits Division is required to prepare this draft hazardous waste permit. The draft hazardous waste permit sets forth all the applicable conditions, which the permittee is required to comply with during the life of the permit. Rhodia submitted its Hazardous Waste Part B Permit Renewal Application to comply with the Environmental Protection Agency (EPA) and LDEQ regulations

requiring the ten year permit renewal for facilities that are permitted to treat, store or dispose of hazardous waste under Subtitle C of the Resource Conservation and Recovery Act (RCRA).

The permitting process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the ability of the permittee to comply with the requirements of the LAC 33: V, Subpart 1, and the Hazardous and Solid Waste Amendments (HSWA) portion.

The public is given a minimum of forty-five (45) days to review and comment on the draft permit. The administrative authority, prior to making a decision or taking any final action on the draft permit, will consider all significant comments. The decision of the administrative authority shall be to issue, deny, modify, or revoke the draft permit in accordance with LAC 33:V.705.

A. DRAFT HAZARDOUS WASTE RENEWAL PERMIT

The Waste Permits Division reviewed the permit application and other pertinent technical information, and prepared a draft permit that contains the language that pertains to the operation of the listed facilities.

This draft hazardous waste permit is a tentative determination and is not the final decision of the administrative authority.

B. PUBLIC COMMENT PERIOD

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft operating permit for the Rhodia Baton Rouge Facility must do so within the allotted forty-five (45) day comment period.

A public hearing for the draft permit will be held on the date, and at the location and time provided in the public notice (See the attached notice in the Public Participation Section of the Draft Permit). LDEQ will hold the hearing at least thirty (30) days after the date on which the public notice is given.

Public notice of the proposed permitting action and of the hearing shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

C. LOCATIONS OF AVAILABLE INFORMATION

The administrative record, including all supporting documents, is on file at the LDEQ Public Records Center, Room 1-127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at $0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

D. WRITTEN COMMENT SUBMISSION

Interested persons may submit written comments on the draft permit to the administrative authority, at the address listed below, by the closing date of the comment period. All comments should include:

1. the name and address of the commenter,

2. a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based,

3. identification of the facility commented on (the EPA Identification Number and AI number), and

4. supporting relevant facts upon which the comments are based.

All comments, further requests for information (including copies of this decision and fact sheet) and any requests by public interest groups or individuals who would like to be included in the mailing list, should be made in writing to

Ms. Soumaya Ghosn
Louisiana Department of Environmental Quality
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Mr. Willard F. Steele
Louisiana Department of Environmental Quality
Office of Environmental Services
Waste Permits Division
Post Office Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3134 or fax (225) 219-3158

III. DESCRIPTION OF OVERALL SITE

The Rhodia Baton Rouge Facility has been in operation since 1926. Currently, the plant occupies approximately 100 acres of land between the Mississippi River and Airline Highway (US 190). The Baton Rouge Facility manufactures sulfuric acid, liquid sulfur dioxide, synthetic vanilla, hydroquinone, pyrocatechol and veratol.

The Baton Rouge Facility is actually composed of two separate operations: Sulfuric Acid Plant producing sulfuric acid and other sulfur products since 1926 and the Cathyval Plant which began production of vanillin in 1990. The Baton Rouge Facility produces various grades of sulfuric acid and oleum through the use of two sulfuric acid regeneration units (SARUs). The two SARUs produce sulfuric acid and other related products by in large part recycling spent acid obtained from refineries and business concerns. This recycling process requires the use of an industrial furnace to drive the reactions. The industrial furnace burns natural gas for fuel, but also burns hazardous waste as an alternative fuel.

IV. HAZARDOUS WASTE FACILITIES

The Baton Rouge Facility has two combustion units, seven existing storage tanks, three truck transfer areas, and one railcar transfer area, which are proposed to be permitted as existing units. The permit will also include as proposed units, four storage tanks and four container storage areas. Activities associated with the hazardous waste units include the thermal treatment of hazardous waste, the blending of hazardous waste and the storage of hazardous waste.

Two Sulfuric Acid Regeneration Units at the Baton Rouge Facility produce various grades of sulfuric acid and oleum from spent sulfuric acid obtained from refineries and a variety of other sources. This recycling process requires the input of energy from an industrial furnace in a thermal regeneration process. Spent sulfuric acid and sulfur-containing waste materials are burned in the combustion chamber ultimately producing sulfur trioxide. The sulfur trioxide is then absorbed in water to form sulfuric acid. Natural gas is burned to drive the recycling process.

However, high and low British Thermal Unit (BTU) pumpable liquid hazardous waste can be treated in the industrial furnace to drive the sulfuric acid recycling process. The liquid hazardous waste generally takes two forms: Organic liquid waste containing chlorinated and nonchlorinated aliphatic and aromatic hydrocarbons, waste oils, organic or inorganic salts, and water emulsions or aqueous wastes containing hazardous constituents. The SARUs will treat the waste with longer residence times and combustions temperature than typical commercial incinerators.

The estimated annual quantity of hazardous waste to be treated or stored varies from 35,000 to 200,000 tons per year. Hazardous waste is generated onsite as a result of the sulfuric acid regeneration process. Approximately 2,000 to 3,000 cubic yards of ash and sludge are generated each year. This waste material may contain heavy metals and other

hazardous constituents that were not destroyed by the combustion in the industrial furnace. These materials are shipped off-site to a permitted TSD facility. No waste is permanently disposed of on-site.

The Baton Rouge Facility has extensive facilities for the storage of waste material prior to treatment. The Baton Rouge Facility currently operates seven hazardous waste tanks and has proposed constructing and operating four more. Tanks are identified by number and serve to store and blend the waste streams prior to combustion in the Sulfuric Acid Regeneration Units. Waste material can be transferred from the tanker truck areas and other storage to the blending tanks through an aboveground fixed pipe rack system. The waste streams ultimately feed into Tanks 210 and 290 which maintain the appropriate rate of feed of hazardous waste to the industrial furnaces.

The Baton Rouge Facility has container storage areas for unloading and/or direct burn of hazardous waste streams. Waste can be shipped to the Baton Rouge Facility through tanker truck or railcar. The waste streams can either be unloaded into storage tanks or transferred directly to the SARUs for direct burn. All container storage areas will be permitted to the standards of LAC 33:V. Chapter 21 and will be partially enclosed.

Currently, there are four permitted container storage areas for the receipt of hazardous waste. Two units (Unit 1 and 2) operate as direct burn/unloading areas for tanker trucks. One unit (Facility Trucks Unloading Area) operating simply as an unloading area, loading waste material into longer termed storage in hazardous waste storage tanks. Finally, there is the Railcar Unloading Area for waste streams received by railcar. All the existing container storage units are designed with two bays to hold two tankers or two railcars.

Rhodia proposes to construct four additional container storage areas. Rhodia proposes to construct a Rail Car Direct Burn/Unloading Area with one railcar slot. An additional Truck Direct Burn/Unloading Area will be constructed with one tanker truck slot. A Truck Storage and Sampling/Unloading Area will be constructed with one slot for a tanker truck; this unit will not be designed for direct burn to a combustion unit. All the container storage units described will be designed to hold tankers, drums and totes.

Rhodia has constructed a container storage area that contains five bays for tanker or trailer trucks, the Trailer Staging Area, under a variance issued November 16, 2007 by the LDEQ. Rhodia proposes to permit the unit to store only tanker or trailer trucks. No sampling or feed to direct burn would be permitted at the trailer staging area. The purpose of the Trailer Staging Area is to provide the Baton Rouge Facility with sufficient storage capacity to safely hold trailer trucks that arrive at the facility. Once space has opened in either a direct burn bay or an unloading bay, then trailer trucks may be transferred from the Trailer Staging Area to the appropriate storage unit. All the container storage areas at the Baton Rouge Facility will be permitted in accordance with LAC33:V.Chapter 21 and other applicable sections of the hazardous waste regulations.

V. FINANCIAL AND LIABILITY REQUIREMENTS

Rhodia has submitted documentation to satisfy the financial assurance and liability requirements of LAC 33:V. Chapter 37. In addition, Rhodia updates the financial assurance mechanism and the associated closure cost estimate as required.

VI. SUMMARY OF ENVIRONMENTAL FACTORS CONSIDERED

In accordance with the requirements set forth by the Louisiana Supreme Court in Save Ourselves v. Louisiana Environmental Control Commission 1152 (la. 1983), the LDEQ has considered the following factors in the draft decision of this renewal permit. This is a preliminary analysis based on information currently available to the LDEQ.

A. The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.

Rhodia has submitted its Part B Permit Renewal Application for the existing Baton Rouge Facility. This permit application will renew the previous operating permit issued to provide site specific conditions by which waste is stored and treated. Waste is stored in tanks and containers at the Baton Rouge Facility. All tanks must be designed and operated in accordance with the conditions set forth in this draft permit as derived from the hazardous waste regulations, LAC 33:V.Chapter 19. In addition, waste is stored in containers and container storage areas as specified in this draft permit and in accordance with LAC 33:V.Chapter 21. The standards for storage that Rhodia must meet are designed to prevent the release of waste material or residue into the environment. This permit renewal does propose to permit new container storage areas and tanks; however, the new units are for the management of the waste received by the Rhodia Baton Rouge Facility. The permit renewal does not propose to increase the amount of waste treated by the SARUs. This permit renewal does not propose the alteration of waste classifications, codes or characteristics.

Waste material in storage tanks and containers is sent to two permitted sulfuric acid regeneration units, No. 1 and No. 2, for the treatment by combustion. The waste is used as an energy source for combustion to drive the recycling process that produces sulfuric acid. Unlike most boiler units and incinerators, EPA has not promulgated MACT standards for the sulfuric acid regeneration units. For this reason, the emissions from the combustion units are regulated under the RCRA regulations. To ensure that products of incomplete combustion are not emitted, the operators at the Baton Rouge Facility must operate the combustion units within the operating and emission limits defined in this draft permit. Trial burns and a risk assessment were performed on the Baton Rouge Facility combustion units to set the operating and emission limits in this draft permit.

Rhodia has entered into a consent decree with the LDEQ and the EPA to lower the emission levels of sulfur dioxide from the sulfuric acid regeneration units at the Baton Rouge Facility. Issuance of this permit action will allow modifications to be made to the sulfuric acid regeneration units so that Rhodia may meet the deadlines in 2010 and 2011 for the reduction of sulfur dioxide emissions.

Rhodia has closed all units that were involved in the land application treatment and disposal of hazardous waste. In addition this draft permit does not propose to expand the boundary of the Baton Rouge Facility. The design and operation of all remaining storage units, tank treatment units, and combustion units will follow the regulations to prevent the unauthorized release of any stored material into the environment. These actions minimize the potential and real adverse environmental effects of handling hazardous waste to the maximum extent possible.

B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.

This is an existing facility submitting an application for permitting of its existing, hazardous waste storage and combustion units. As stated previously, the Rhodia Baton Rouge Facility has been in operation for several decades producing sulfuric acid and other sulfur products by recycling spent sulfur containing waste. Rhodia recycles 55 million gallons of spent sulfur containing material that would otherwise have to be disposed as a hazardous waste. In addition, the sulfuric acid and other sulfur based products are used in the production of a variety of materials including, gasoline, fertilizer, detergents, textiles, and pharmaceuticals. Thus, the production of the sulfuric acid products supports a variety of industries, in addition to the Rhodia Baton Rouge Facility. Rhodia will manage the receipt of waste and the operations of their hazardous waste management units in accordance with the appropriate regulations and the approved final permit. In addition, any waste generated at the Baton Rouge Facility is shipped to approved hazardous waste disposal facilities for off-site disposal.

Over 1,700 area residents are employed at the Baton Rouge Facility. Both the state and local economies benefit from the provision of employment and tax revenue at the Rhodia Baton Rouge Facility. The proposed permit is an important factor for the continued operation of the Baton Rouge Facility.

The proposed permit should have little or no affect on property values or public costs pertaining to the economics of the local community, since the Rhodia Baton Rouge Facility is an existing facility. The proposed permit renewal should not promote the need for additional fire protection, police, medical facilities, or roads.

C. There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.

1. ALTERNATIVE PROJECTS

This draft permit renewal is for hazardous waste storage and combustion units that were operating under the terms of a previously issued hazardous waste permit. One of Rhodia's major business ventures is the reclamation of sulfuric acid from spent sulfuric acid. Companies will ship spent sulfuric acid that can no longer be used in a refining or other production process to the Rhodia Baton Rouge Facility. Rhodia then regenerates (recycles) useable sulfuric acid from that spent sulfuric acid. Plants that use sulfuric acid in a production process can use the regenerated spent material rather than newly produced sulfuric acid. As long as industries exist that use significant amounts of sulfuric acid, reclamation of sulfuric acid is a preferable option to the disposal of sulfuric acid containing waste.

The reclamation of sulfuric acid requires the input of energy which is generated by co-burning either natural gas or some other material that can substitute as fuel. The combustion of hazardous waste serves two functions: the treatment of hazardous waste and the driving of the sulfuric acid regeneration process. There appears to be no known alternative projects that would offer more protection to the environment than permitting the existing facilities without unduly curtailing non-environmental benefits of the sulfuric acid regeneration process.

2. ALTERNATIVE SITE

This draft permit renewal is for an existing facility. The hazardous waste units to be permitted will store and treat hazardous waste that is generated off-site and are necessary for the continued operation of the sulfuric acid regeneration process at the Rhodia Baton Rouge Facility. Relocation of the facility could only be done at significant economic cost to the Permittee. In addition, relocation may result in new environmental issues due to unforeseen circumstances at a new site.

3. MITIGATING MEASURES

The Rhodia Baton Rouge Facility is an existing facility that regenerates sulfuric acid from spent sulfuric acid and other sulfur based wastes. The combustion of liquid hazardous waste is used as fuel to drive the reactions that regenerate the sulfuric acid. Rhodia has instituted a waste

management program to properly manage hazardous waste received from off-site sources.

In addition, Rhodia has performed test burns for the two sulfuric acid regeneration units to develop emission standards protective of the environment and operating limits to maintain those standards. These standards and limits are contained in this draft permit. Data generated from the test burns was used to develop a risk assessment of the impact of the emissions from the SARUs on the surrounding community. Additional limits for the SARUs are included in this draft permit to ensure that the operation of the units is protective of human health and the environment. No mitigating measures would offer more protection to the environment than permitting the existing treatment and storage units without unduly curtailing non-environmental benefits.

SIGNATURE PAGE

DRAFT PERMIT

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

HAZARDOUS WASTE OPERATING PERMIT

PERMITTEE: RHODIA INC.

PERMIT NUMBER: LAD008161234-OP-RN-1
Agency Interest # 1314/ Activity #PER19980003

FACILITY LOCATION: 1275 AIRLINE HIGHWAY,
BATON ROUGE, LOUISIANA, 70806

This permit is issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law R.S. 20:2171 et seq., and the regulations adopted thereunder and under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) to Rhodia, Inc., (hereafter called the Permittee), to operate a hazardous waste Treatment, Storage and Disposal (TSD) facility located at Baton Rouge, Louisiana, at latitude 30° 30' 034" and longitude 91° 11' 010."

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality, or his/her designee.

The permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein and the applicable regulations as specified in the permit. Applicable regulations are those which are in effect on the effective date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the Permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Section 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit.

Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification, revocation, and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The Permittee must inform the LDEQ of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit shall be effective as of _____, and shall remain in effect until_____, unless revoked, reissued, modified or terminated in accordance with LAC 33:V.323 and 705 of the Louisiana Hazardous Waste Regulations. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

Provisions of this permit may be appealed in writing pursuant to LA. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

Louisiana Department of Environmental Quality
Office of the Secretary
Attention: Hearings Clerk, Legal Services Division
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

Draft

Cheryl Sonnier Nolan, Assistant Secretary
Louisiana Department of Environmental Quality

Date

PUBLIC PARTICIPATION

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
RHODIA INC. / BATON ROUGE FACILITY
PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENT ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT

The LDEQ, Office of Environmental Services, will conduct a public hearing to receive comments on a draft hazardous waste operating renewal permit for Rhodia Inc., 1275 Airline Highway, Baton Rouge, Louisiana 70805 for the Baton Rouge Facility. **The facility is located at 1275 Airline Highway, Baton Rouge, East Baton Rouge Parish.**

The hearing will be held on **Tuesday, September 9, 2008, beginning at 6:00 p.m., at the Louisiana Department of Environmental Quality, Galvez Building Conference Center, Pensacola Room, 602 North 5th Street, Baton Rouge, LA.** During the hearing, all interested persons will have an opportunity to comment on the draft permit.

Free parking will be available at the Galvez Parking Garage facing the Galvez building on North Street. Parking tickets for the public hearing attendees will be validated by DEQ for the free parking. During the hearing, all interested persons will have an opportunity to comment on the draft permit.

Rhodia Inc., requested a hazardous waste permit renewal governing the operation of two sulfuric acid regeneration units, storage tanks, and container storage units for the treatment and storage of hazardous waste at the Baton Rouge Facility. Rhodia is a commercial facility that accepts liquid sulfur-containing hazarodus waste for storage and ultimately treatment by combustion. The hazardous waste treatment and storage is associated with the sulfuric acid production area at the Baton Rouge Facility. Rhodia produces sulfuric acid and other related materials from the reclamation of spent sulfuric acid and other sulfur containing wastes. The reclamation process involved the use of a sulfuric acid furnace. The combustion of natural gas and hazardous waste provides the energy to drive the sulfuric acid regeneration process. Sulfuric acid and other related sulfur products are then sold to a variety of manufacturers for a variety of purposes including the production of gasoline and fertilizers.

Rhodia submitted a hazardous waste permit renewal application describing the Baton Rouge Facility and compliance with the hazardous waste regulations. In addition, trial burns were performed for the sulfuric acid regeneration units to develop operating limits and emission standards in accordance with the state and federal requirements. This draft permit details the proposed conditions Rhodia must meet at the Baton Rouge Facility to provide protection for human health and the environment.

Written comments or written requests for notification of the final permit decision regarding this permit may also be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests for notification must be received by 12:30 p.m., Thursday, September 11, 2008.** Written comments will be considered prior to a final permit decision.

LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The draft permit and associated information are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov**.

An additional copy may be reviewed at the East Baton Rouge Parish Library, Delmont Gardens Branch, 3351 Lorraine Street, Baton Rouge, LA 70805.

Individuals with a disability, who need an accommodation in order to participate in the public hearing, should contact Ms. Dina Heidar at the above address or by phone at (225) 219-3278.

Inquiries or requests for additional information regarding this permit action should be directed to Will F. Steele, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3134.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft permit and associated information can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm

All correspondence should specify AI Number 1314, Permit Number LAD008161234-OP-1-RN-1, and Activity Number PER19980003.

Scheduled Publication Date: Monday, July 21, 2008

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

July 15, 2008

Phone: (225) 383-1111
Fax: (225) 388-0164

Ms. Susan Bush
Legal Advertising
The Advocate
P.O. Box 588
Baton Rouge, LA 70821-0588

Re: **REQUEST FOR PUBLIC COMMENTS ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT**
RHODIA INC. / BATON ROUGE FACILITY
AI NUMBER 1314, PERMIT NUMBER LAD008161234-OP-1-RN-1, AND ACTIVITY NUMBER PER19980003
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

Dear Ms. Bush:

Please publish the attached legal notice regarding the above referenced facility as a regular legal ad in the ADVOCATE *once only* on **Monday, July 21, 2008.** You will also receive a copy of the legal notice itself via email at: legal.ads@theadvocate.com

Immediately after publication, please fax a copy of the ad to Ms. Dina Heidar at (225) 325-8149.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Newspaper', and fax it to the attention of Ms. Dina Heidar (225) 325-8149 immediately upon publication. If the notice cannot be published on the date requested, please contact Ms. Dina Heidar (225) 219-3278 or email: dina.heidar@la.gov

The invoice for this public notice should be sent to:
Gerald Perry
Rhodia Inc.
1275 Airline Highway
Baton Rouge, LA 70805

Company Contact: Gerald Perry
Telephone: (337) 708-4370

Company Contact: Don Johnson
Telephone: (337) 708-4789

The official proof of publication in the form of a **tear sheet** should be mailed to the attention of Ms. Dina Heidar, LDEQ, Environmental Assistance Division, P.O. Box 4313, Baton Rouge, LA 70821-4313.

Thank you for assisting in our effort to serve the public.

Sincerely,
Dina Heidar
Environmental Scientist, Public Participation Group

DH
Attachments/2

VERIFICATION BY NEWSPAPER

The undersigned verifies that the following public notice was published in the _____(date of publication) edition of the **Advocate:**

Re: REQUEST FOR PUBLIC COMMENTS ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT
RHODIA INC. / BATON ROUGE FACILITY
AI NUMBER 1314, PERMIT NUMBER LAD008161234-OP-1-RN-1, AND ACTIVITY NUMBER PER19980003
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

ADVOCATE:

By: _____ Date: _____

Immediately upon publication please fax this form, along with a copy of the public notice as it appeared in the newspaper, to Ms. Dina Heidar (225)325-8149.

Please note

This verification does not relieve the newspaper of the responsibility of providing official proof of publication, in the form of a tear sheet, to the LDEQ as requested in our cover letter.

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

July 17, 2008

Via Fax (225)-231-1879
Phone (225)-335-0216

Mr. Mike Norwood
WJBO-AM
PO Box 14061
Baton Rouge, LA 70898-4061

Re: **PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENTS ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT**
RHODIA INC. / BATON ROUGE FACILITY
AI NUMBER 1314, PERMIT NUMBER LAD008161234-OP-1-RN-1, AND ACTIVITY NUMBER PER19980003
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

Dear Mr. Norwood:

Please broadcast the enclosed public announcement regarding the above referenced facility *once only*, **at around 7:00 am on Monday, July 21, 2008.** You will also receive a copy of the broadcast via email at mikenorwood@clearchannel.com.

The charges for this service should be billed to:
Gerald Perry
Rhodia Inc.
1275 Airline Highway
Baton Rouge, LA, 70805

Company Contact: Gerald Perry
Telephone: (337) 708-4370

Company Contact: Don Johnson
Telephone: (337) 708-4789

We are requesting that you sign and date the enclosed 'Verification by Radio Station', and fax it to the attention of Ms. Laura Ambeau at (225) 325-8157, as soon as the announcement has been broadcast.

If there is any problem with broadcasting this announcement in its entirety, or if you have any further questions, please contact Ms. Laura Ambeau immediately at (225) 219-3277 or via email at laura.ambeau@la.gov.

Thank you for assisting in our effort to serve the public.

Sincerely,

Laura M. Ambeau
Environmental Scientist, Public Participation Group

LA

Attachments/2

VERIFICATION BY RADIO STATION

The undersigned verifies that the attached public announcement, associated with the public notice referenced below, was broadcast on WJBO-AM at _____ (time of day) on the _____ (day) of _____ (month), 2008.

Re: **PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENTS ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT**
RHODIA INC. / BATON ROUGE FACILITY
AI NUMBER 1314, PERMIT NUMBER LAD008161234-OP-1-RN-1, AND ACTIVITY NUMBER PER19980003
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

WJBO-AM:

By: _____ Date: _____

Please complete and return this form to the address listed below promptly after broadcast of the public service announcement, or fax it to the attention of Laura Ambeau at (225) 325-8157.

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3277

FAX (225) 325-8157

LDEQ
RADIO ANNOUNCEMENT
DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT

The LDEQ, Office of Environmental Services, will conduct a public hearing to receive comments on the draft hazardous waste operating renewal permit for Rhodia, Inc., 1275 Airline Highway, Baton Rouge, LA 70805 for the Baton Rouge Facility. **The facility is located at 1275 Airline Highway, Baton Rouge, East Baton Rouge Parish.**

The hearing will be held on Tuesday, September 9, 2008, beginning at 6:00 p.m., at the Louisiana Department of Environmental Quality, Galvez Building Conference Center, Pensacola Room, 602 North 5th Street, Baton Rouge, LA. During the hearing, all interested persons will have an opportunity to comment on the draft hazardous waste operating renewal permit.

The public comment period will end on Thursday, September 11, 2008 at 12:30 p.m.

A copy of the draft hazardous waste operating renewal permit and related documents are available for review at the East Baton Rouge Parish Library-Delmont Gardens Branch, 3351 Lorraine Street, Baton Rouge, LA and the Louisiana Department of Environmental Quality Public Records Center in Baton Rouge, LA.

The detailed public notice is scheduled for publication in The Advocate on July 21, 2008.

For any inquiries contact LDEQ Customer Service Center at (225) 219-LDEQ, that is (225) 219-5337.

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

July 17, 2008

Tel: (214) 665-6750

Mr. Kishor Fruitwala, Ph.D., P.E.
U. S. EPA, Region VI
1445 Ross Avenue
Dallas, Texas 75202-2733

Re: **PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENTS ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT**
RHODIA INC. / BATON ROUGE FACILITY
AI NUMBER 1314, PERMIT NUMBER LAD008161234-OP-1-RN-1, AND ACTIVITY NUMBER PER19980003
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

Dear Mr. Fruitwala:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your reference, a copy of the draft hazardous waste permit and the legal notice for the public notice for public comments to be published in THE ADVOCATE on Monday, July 21, 2008. There will also be radio announcement on WJBO-AM Radio Station in Baton Rouge, LA. It is also posted on the LDEQ Website, found at www.deq.state.la.us. Written comments on the draft Hazardous Waste Operating Renewal Permit may be submitted to Ms. Soumaya Ghosn, LDEQ-OES, Environmental Assistance Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. All comments regarding the draft Hazardous Waste Operating Renewal Permit should specify Agency Interest (AI) No. 1314.

Should you have any questions additional permit information may be obtained from Mr. Will Steele, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3134. Should you have any questions regarding the **draft hazardous waste operating renewal permit**, please contact Ms. Dina Heidar, LDEQ, Environmental Assistance Division, Stakeholder Outreach Section, at (225) 219-3278.

Please complete the attached 'Verification of Receipt' and mail to Ms. Dina Heidar, LDEQ-OES, Environmental Assistance Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8149.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call Ms. Heidar at (225) 219-3278.

Sincerely,

Dina Heidar
Environmental Scientist, Public Participation Group

DH

Attachments/3

VERIFICATION BY EPA

The undersigned verifies that the EPA Region VI Office has received a copy of the draft hazardous waste operating renewal permit and the public notice regarding:

Re: **PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENTS ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT**
RHODIA INC. / BATON ROUGE FACILITY
AI NUMBER 1314, PERMIT NUMBER LAD008161234-OP-1-RN-1, AND ACTIVITY NUMBER PER19980003
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

EPA Region VI:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Dina Heidar
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3278
Fax (225) 325-8149

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

July 17, 2008

Phone : 225-354-7050

Mary Stein and Patricia Husband, Interim Co-Directors
East Baton Rouge Parish Library
Delmont Gardens Branch
3351 Lorraine Stree
Baton Rouge, LA 70805

Re: **PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENTS ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT**
RHODIA INC. / BATON ROUGE FACILITY
AI NUMBER 1314, PERMIT NUMBER LAD008161234-OP-1-RN-1, AND ACTIVITY NUMBER PER19980003
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

Dear Ms. Stein/ Ms. Husband:

We request that the enclosed draft hazardous waste operating renewal permit and all subsequent submittals of additional information and public notice associated with the referenced facility be made available for public review upon receipt in the **East Baton Rouge Parish Library, Delmont Gardens Branch, 3351 Lorraine Street, Baton Rouge, LA 70805.** It is imperative that these documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The documents should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Permits Division, will provide written notice to you requesting that the information be removed.

Please complete the attached 'Verification by Library' and mail to Ms. Dina Heidar, LDEQ-OES, Environmental Assistance Division, Post Office Box 4313, Baton Rouge, Louisiana 70821-4313, or Fax to (225) 325-8149.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call Ms. Heidar at (225) 219-3278.

Sincerely,

Dina Heidar
Environmental Scientist, Public Participation Group

DH

Attachments/2

VERIFICATION BY LIBRARY

The undersigned verifies that the East Baton Rouge Parish Library, Delmont Gardens Branch, 3351 Lorraine Street, Baton Rouge, LA 70805 has received a copy of the draft hazardous waste operating renewal permit and all subsequent submittals of additional information associated with the following public notice:

Re: **PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENTS ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT**
RHODIA INC. / BATON ROUGE FACILITY
AI NUMBER 1314, PERMIT NUMBER LAD008161234-OP-1-RN-1, AND ACTIVITY NUMBER PER19980003
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

EAST BATON ROUGE PARISH LIBRARY, DELMONT GARDENS BRANCH:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Dina Heidar
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
PHONE (225) 219-3278

FAX (225) 325-8149

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

July 18, 2008

Melvin 'Kip' Holden, Mayor-President
East Baton Rouge Parish Metro Council
222 St. Louis Street, 3rd Floor
Baton Rouge, LA 70802
Phone (225) 389-5100

Re: PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENTS ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT
RHODIA INC. / BATON ROUGE FACILITY
AI NUMBER 1314, PERMIT NUMBER LAD008161234-OP-1-RN-1, AND ACTIVITY NUMBER PER19980003
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

Dear Mayor President Holden:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your reference, a copy of the draft hazardous waste operating renewal permit and legal notice that is scheduled to be published in The Advocate on July 21, 2008.

Should you have any questions regarding the facility, additional permit information may be obtained from Mr. Will F. Steele, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3134.

Sincerely,

Dina Heidar
Environmental Scientist, Public Participation Group

LA

Enclosures/2

VERIFICATION BY PARISH GOVERMENT

The undersigned verifies that the Mayor President, East Baton Rouge Parish Metro Council has received a copy of the draft hazardous waste operating renewal permit regarding:

Re: **PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENTS ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT**
RHODIA INC. / BATON ROUGE FACILITY
AI NUMBER 1314, PERMIT NUMBER LAD008161234-OP-1-RN-1, AND ACTIVITY NUMBER PER19980003
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

East Baton Rouge Parish Government:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Dina Heidar
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277

FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

July 18, 2008

Phone: (225) 219-3600
fax: (225) 219-3695

Mr. Bobby Mayweather
Capital Regional Office
602 North 5th Street
Baton Rouge, La. 70821-4312

Re: PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENTS ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT
RHODIA INC. / BATON ROUGE FACILITY
AI NUMBER 1314, PERMIT NUMBER LAD008161234-OP-1-RN-1, AND ACTIVITY NUMBER PER19980003
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

Dear Mr. Mayweather:

The Louisiana Department of Environmental Quality (LDEQ) is informing you of the draft hazardous waste operating renewal permit and legal notice that is scheduled to be published in The Advocate on July 21, 2008.

Should you have any questions regarding the facility, additional permit information may be obtained from Mr. Will F. Steele, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3134.

Sincerely,

Dina Heidar
Environmental Scientist, Public Participation Group

LA
Enclosures

VERIFICATION BY REGIONAL OFFICE

The undersigned verifies that the Capital Regional Office has received a copy of the draft hazardous waste operating renewal permit and public notice regarding:

Re: **PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENTS ON A DRAFT HAZARDOUS WASTE OPERATING RENEWAL PERMIT**
RHODIA INC. / BATON ROUGE FACILITY
AI NUMBER 1314, PERMIT NUMBER LAD008161234-OP-1-RN-1, AND ACTIVITY NUMBER PER19980003
BATON ROUGE, EAST BATON ROUGE PARISH, LOUISIANA

Capital Regional Office:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Dina Heidar
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3277

FAX (225) 325-8157

PART A
APPLICATION

OMB#: 2050-0034 Expires 11/30/2005

SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office.

United States Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION FORM

1. Reason for Submittal (See instructions on page 14.)

MARK ALL BOX(ES) THAT APPLY

Reason for Submittal:

- ☐ To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)
- ☐ To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☑ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # N/A)
- ☐ As a component of the Hazardous Waste Report

2. Site EPA ID Number (page 15)

EPA ID Number: LAD008116123 4

3. Site Name (page 15)

Name: Rhodia, Inc.

4. Site Location Information (page 15)

Street Address: 1275 Airline Highway

City, Town, or Village: Baton Rouge | State: Louisiana

County Name: East Baton Rouge | Zip Code: 70805

5. Site Land Type (page 15)

Site Land Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

6. North American Industry Classification System (NAICS) Code(s) for the Site (page 15)

A. 325188 | B. 325199

C. | D.

7. Site Mailing Address (page 16)

Street or P. O. Box: 1275 Airline Highway

City, Town, or Village: Baton Rouge

State: Louisiana

Country: USA | Zip Code: 70805

8. Site Contact Person (page 16)

First Name: John | MI: M | Last Name: Lewis

Phone Number: (225) 359-3751 Extension: | Email address: marcus.lewis@us.rhodia.com

9. Operator and Legal Owner of the Site (pages 16 and 17)

A. Name of Site's Operator: Rhodia, Inc. | Date Became Operator (mm/dd/yyyy): 01/28/1998

Operator Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

B. Name of Site's Legal Owner: Rhodia, Inc. | Date Became Owner (mm/dd/yyyy): 01/28/1998

Owner Type: ☑ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

EPA ID NO: I_L__I_A__I_D__I_0__I_0__I_8__I_1__I_6__I_1__I_2__I_3__I_4__I OMB#: 2050-0034 Expir

9. Legal Owner (Continued) Address	Street or P. O. Box: CN 7500, 8 Cedar Brook Drive	
	City, Town, or Village: Cranbury	
	State: New Jersey	
	Country: USA	Zip Code: 08512

10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 18 to 21.)

A. Hazardous Waste Activities

Complete all parts for 1 through 6.

Y ☑ N ☐ **1. Generator of Hazardous Waste**

If "Yes", choose only one of the following - a, b, or c.

☑ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or

☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or

☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☑ d. United States Importer of Hazardous Waste

Y ☐ N ☑ e. Mixed Waste (hazardous and radioactive) Generator

Y ☐ N ☑ **2. Transporter of Hazardous Waste**

Y ☑ N ☐ **3. Treater, Storer, or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.

Y ☐ N ☑ **4. Recycler of Hazardous Waste (at your site)**

Y ☐ N ☑ **5. Exempt Boiler and/or Industrial Furnace**

If "Yes", mark each that applies.

☐ a. Small Quantity On-site Burner Exemption

☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☑ **6. Underground Injection Control**

B. Universal Waste Activities

Y ☐ N ☑ **1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. If "Yes", mark all boxes that apply:**

	Generate	Accumulate
a. Batteries	☐	☐
b. Pesticides	☐	☐
c. Thermostats	☐	☐
d. Lamps	☐	☐
e. Other (specify) _____	☐	☐
f. Other (specify) _____	☐	☐
g. Other (specify) _____	☐	☐

Y ☐ N ☑ **2. Destination Facility for Universal Waste**

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply.

Y ☐ N ☑ **1. Used Oil Transporter**

If "Yes", mark each that applies.

☐ a. Transporter

☐ b. Transfer Facility

Y ☐ N ☑ **2. Used Oil Processor and/or Re-refiner**

If "Yes", mark each that applies.

☐ a. Processor

☐ b. Re-refiner

Y ☐ N ☑ **3. Off-Specification Used Oil Burner**

Y ☐ N ☑ **4. Used Oil Fuel Marketer**

If "Yes", mark each that applies.

☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner

☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

EPA ID NO: I_L__I_A__I_D__I I_0__I_0__I_8__I I_1_I_6__I_1__I I_2__I_3__I_4__I OMB#: 2050-0034 Expir

11. Description of Hazardous Wastes (See instructions on page 22.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D004	D007	D010	D013	D016	D019
D002	D005	D008	D011	D014	D017	D020
D003	D006	D009	D012	D015	D018	D021

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 22.)

Item 11 A.
1. Additional Waste Codes are listed in continuation sheets.
2. Federal and State Waste Code number are the same.

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.
For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11).
(See instructions on page 22.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
J Marcus Lewis	J. Marcus Lewis, Plant Manager	10/4/07

EPA ID No.	L	A	D	0	0	8	1	6	1	2	3	4

11. A. Waste Codes for Federally Regulated Hazardous Wastes (CONTINUED)

D022	F009	K018	K048	K106	K156	P016	P050
D023	F010	K019	K049	K107	K157	P017	P051
D024	F011	K020	K050	K108	K158	P018	P054
D025	F012	K021	K051	K109	K159	P020	P056
D026	F019	K022	K052	K110	K161	P021	P057
D027	F024	K023	K060	K111	K169	P022	P058
D028	F025	K024	K061	K112	K170	P023	P059
D029	F028	K025	K062	K113	K171	P024	P060
D030	F032	K026	K069	K114	K172	P026	P062
D031	F034	K027	K071	K115	K174	P027	P063
D032	F035	K028	K073	K116	K175	P028	P064
D033	F037	K029	K083	K117	K176	P029	P065
D034	F038	K030	K084	K118	K177	P030	P066
D035	F039	K031	K085	K123	K178	P031	P067
D036	K001	K032	K086	K124	K181	P033	P068
D037	K002	K033	K087	K125	P001	P034	P069
D038	K003	K034	K088	K126	P002	P036	P070
D039	K004	K035	K093	K131	P003	P037	P071
D040	K005	K036	K094	K132	P004	P038	P072
D041	K006	K037	K095	K136	P005	P039	P073
D042	K007	K038	K096	K141	P006	P040	P074
D043	K008	K039	K097	K142	P007	P041	P075
F001	K009	K040	K098	K143	P008	P042	P076
F002	K010	K041	K099	K144	P009	P043	P077
F003	K011	K042	K100	K145	P010	P044	P078
F004	K013	K043	K101	K147	P011	P045	P081
F005	K014	K044	K102	K148	P012	P046	P082
F006	K015	K045	K103	K149	P013	P047	P084
F007	K016	K046	K104	K150	P014	P048	P085
F008	K017	K047	K105	K151	P015	P049	P087

EPA ID No.	L	A	D	0	0	8	1	6	1	2	3	4

A. Waste Codes for Federally Regulated Hazardous Wastes (CONTINUED)

P088	P123	U012	U044	U076	U108	U138	U169
P089	P127	U014	U045	U077	U109	U140	U170
P092	P128	U015	U046	U078	U110	U141	U171
P093	P185	U016	U047	U079	U111	U142	U172
P094	P188	U017	U048	U080	U112	U143	U173
P095	P189	U018	U049	U081	U113	U144	U174
P096	P190	U019	U050	U082	U114	U145	U176
P097	P191	U020	U051	U083	U115	U146	U177
P098	P192	U021	U052	U084	U116	U147	U178
P099	P194	U022	U053	U085	U117	U148	U179
P101	P196	U023	U055	U086	U118	U149	U180
P102	P197	U024	U056	U087	U119	U150	U181
P103	P198	U025	U057	U088	U120	U151	U182
P104	P199	U026	U058	U089	U121	U152	U183
P105	P201	U027	U059	U090	U122	U153	U184
P106	P202	U028	U060	U091	U123	U154	U185
P108	P203	U029	U061	U092	U124	U155	U186
P109	P204	U030	U062	U093	U125	U156	U187
P110	P205	U031	U063	U094	U126	U157	U188
P111	U001	U032	U064	U095	U127	U158	U189
P112	U002	U033	U066	U096	U128	U159	U190
P113	U003	U034	U067	U097	U129	U160	U191
P114	U004	U035	U068	U098	U130	U161	U192
P115	U005	U036	U069	U099	U131	U162	U193
P116	U006	U037	U070	U101	U132	U163	U194
P118	U007	U038	U071	U102	U133	U164	U196
P119	U008	U039	U072	U103	U134	U165	U197
P120	U009	U041	U073	U105	U135	U166	U200
P121	U010	U042	U074	U106	U136	U167	U201
P122	U011	U043	U075	U107	U137	U168	U202

EPA ID No.	L	A	D	0	0	8	1	6	1	2	3	4

A. Waste Codes for Federally Regulated Hazardous Wastes (CONTINUED)

U203	U240						
U204	U243						
U205	U244						
U206	U246						
U207	U247						
U208	U248						
U209	U249						
U210	U271						
U211	U278						
U213	U279						
U214	U280						
U215	U328						
U216	U353						
U217	U359						
U218	U364						
U219	U367						
U220	U372						
U221	U373						
U222	U387						
U223	U389						
U225	U394						
U226	U395						
U227	U404						
U228	U407						
U234	U409						
U235	U410						
U236	U411						
U237							
U238							
U239							

PART A-HAZARDOUS WASTE PERMIT IDENTIFICATION FORM

EPA ID NO: LA D 110 108 116 112 134

OMB #: 2050-0034 Expir

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact (See instructions on page 23)	First Name: John	MI: M	Last Name: Lewis
	Phone Number: (225) 359-3751		Phone Number Extension:
2. Facility Permit Contact Mailing Address (See instructions on page 23)	Street or P.O. Box: 1275 Airline Highway		
	City, Town, or Village: Baton Rouge		
	State: Louisiana		
	Country: USA		Zip Code: 70805
3. Operator Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: 1275 Airline Highway		
	City, Town, or Village: Baton Rouge		
	State: Louisiana		
	Country: USA	Zip Code: 70805	Phone Number (225) 359-3751
4. Legal Owner Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: CN 7500, 8 Cedar Brook Drive		
	City, Town, or Village: Cranbury		
	State: New Jersey		
	Country: USA	Zip Code: 08512	Phone Number (609) 860-4000
5. Facility Existence Date (See instructions on page 24)	Facility Existence Date (mm/dd/yyyy): 01/01/1925		

6. Other Environmental Permits (See instructions on page 24)

A. Permit Type (Enter code)	B. Permit Number	C. Description
R	0 0 8 1 6 1 2 3 4	Hazardous Waste Permit
N	0 0 5 2 2 3	LPDES Water Discharge Permit
P	0 8 4 0 0 0 0 3 3	Title V Air Permit for the Sulfuric Acid Plant
P	2 1 8 4	Title V Air Permit for the Vanillin Production Facility
P		

7. Nature of Business (Provide a brief description; see instructions on page 24)

The Rhodia plant produces various strengths and grades of sulfuric acid and oleum using two separate spray-burning sulfuric acid regeneration units (SARUs). The recycling process for each unit requires the use of an industrial furnace for the process to take place. The furnaces utilize natural gas as the primary fuel. However high and low BTU liquid hazardous wastes are also treated in the SARUs.

EPA ID NO: I_L__I_A__I_D__I I_0__I_0__I_8__I I_1__I_6__I_1__I I_2__I_3__I_4__I OMB #: 2050-0034 Expir

Process Codes and Design Capacities (See Instructions on page 24) - Enter information in the Sections on Form Page 3.

A. PROCESS CODE - *Enter the code from the list of process codes in the table below that best describes each process to be used at the facility. Fifteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), enter the process information in Item 9 (including a description).*

B. PROCESS DESIGN CAPACITY- *For each code entered in Section A, enter the capacity of the process.*

1. AMOUNT - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.*

2. UNIT OF MEASURE - *For each amount entered in Section B(1), enter the code in Section B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.*

C. PROCESS TOTAL NUMBER OF UNITS - *Enter the total number of units for each corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Disposal:	
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day or Liters Per Day
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards
D99	Other Disposal	Any Unit of Measure in Code Table Below
	Storage:	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
[illegible]	Waste Pile	Cubic Yards or Cubic Meters
[illegible]	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards
S06	Containment Building Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure in Code Table Below
	Treatment:	
T01	Tank Treatment	Gallons Per Day; Liters Per Day
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Treatment (continued):	
T81	Cement Kiln	For T81-T93:
T82	Lime Kiln	
T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds
T84	Phosphate Kiln	Per Hour; Short Tons Per Hour; Kilograms
T85	Coke Oven	Per Hour; Metric Tons Per Day; Metric
T86	Blast Furnace	Tons Per Hour; Short Tons Per Day; Btu Per
T87	Smelting, Melting, or Refining Furnace	Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
T88	Titanium Dioxide Chloride Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed In 40 CFR §260.10	
T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
	Miscellaneous (Subpart X):	
X01	Open Burning/Open Detonation	Any Unit of Measure in Code Table Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
[illegible]	L
[illegible] Per Hour	H
[illegible] Per Day	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R
Million Btu Per Hour	X

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
Btu Per Hour	I

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Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	(2) Unit of Measure (Enter code)	C. Process Total Number of Units	For Official Use Only
X	1	S	0	2	5 3 3 .7 8 8	G	0 0 1	
	1	T	9	1	900 . 0	N	001	
	2	T	9	1	1200 . 0	N	001	
	3	S	0	2	12000 . 0	G	005	
	4	S	0	2	8000 . 0	G	003	
	5	S	0	2	47000 . 0	G	002	
	6	S	0	2	152000 . 0	G	001	
	7	S	0	1	14000 . 0	G	003	
	8	S	0	1	7000 . 0	G	002	
	9	S	0	1	70000 . 0	G	001	
1	0	S	0	1	33500 . 0	G	001	
1	1	S	0	1	33500 . 0	G	001	
1	2				.			
1	3				.			
1	4				.			
1	5				.			

NOTE: If you need to list more than 15 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item 9.

9. Other Processes (See instructions on page 25 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in sequence with Item 8)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	(2) Unit of Measure (Enter code)	C. Process Total Number of Units	D. Description of Process
X	2	T	0	4	1 0 0 . 0 0 0	U	0 0 1	In-situ Vitrification
	1				.			
	2				.			
	3				.			
					.			
					.			

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10. Description of Hazardous Wastes (See instructions on page 25) - Enter Information in the Sections on Form Page 5.

EPA HAZARDOUS WASTE NUMBER - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. ESTIMATED ANNUAL QUANTITY - *For each listed waste entered in Section A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Section A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. UNIT OF MEASURE - *For each quantity entered in Section B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	*CODE*	*METRIC UNIT OF MEASURE*	*CODE*
POUNDS	*P*	*KILOGRAMS*	*K*
TONS	*T*	*METRIC TONS*	*M*

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the listed hazardous wastes.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of Item 10.D(1).*
3. *Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.*

2. PROCESS DESCRIPTION: *If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in Section A. On the same line complete Sections B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In Section A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Section D(2) on that line enter "included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		*A. EPA Hazardous Waste No. (Enter code)*				*B. Estimated Annual Quantity of Waste*	*C. Unit of Measure (Enter code)*	*D. PROCESSES*									
								(1) PROCESS CODES (Enter code)									*(2) PROCESS DESCRIPTION- (If a code is not entered in D(1))*
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
[illegible]	3	D	0	0	1	100	P	T	0	3	D	8	0				
[illegible]	[illegible]	D	0	0	2												Included With Above

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10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D001	65,000,000	P	T 9 1 S 0 1 S 0 2	
2	D002	25,000,000	P	T 9 1 S 0 1 S 0 2	
3	D003	5,000,000	P	T 9 1 S 0 1 S 0 2	
4	D004	1,000,000	P	T 9 1 S 0 1 S 0 2	
5	D005	100,000	P	T 9 1 S 0 1 S 0 2	
6	D006	100,000	P	T 9 1 S 0 1 S 0 2	
7	D007	23,000,000	P	T 9 1 S 0 1 S 0 2	
8	D008	1,000,000	P	T 9 1 S 0 1 S 0 2	
9	D009	100,000	P	T 9 1 S 0 1 S 0 2	
10	D010	10,000,000	P	T 9 1 S 0 1 S 0 2	
11	D011	100,000	P	T 9 1 S 0 1 S 0 2	
12	D012	100,000	P	T 9 1 S 0 1 S 0 2	
13	D013	100,000	P	T 9 1 S 0 1 S 0 2	
14	D014	100,000	P	T 9 1 S 0 1 S 0 2	
15	D015	100,000	P	T 9 1 S 0 1 S 0 2	
16	D016	100,000	P	T 9 1 S 0 1 S 0 2	
17	D017	100,000	P	T 9 1 S 0 1 S 0 2	
18	D018	25,000,000	P	T 9 1 S 0 1 S 0 2	
19	D019	10,000,000	P	T 9 1 S 0 1 S 0 2	
20	D020	100,000	P	T 9 1 S 0 1 S 0 2	
21	D021	10,000,000	P	T 9 1 S 0 1 S 0 2	
22	D022	1,000,000	P	T 9 1 S 0 1 S 0 2	
23	D023	100,000	P	T 9 1 S 0 1 S 0 2	
24	D024	100,000	P	T 9 1 S 0 1 S 0 2	
25	D025	100,000	P	T 9 1 S 0 1 S 0 2	
26	D026	15,000,000	P	T 9 1 S 0 1 S 0 2	
27	D027	1,000,000	P	T 9 1 S 0 1 S 0 2	
28	D028	1,000,000	P	T 9 1 S 0 1 S 0 2	
29	D029	1,000,000	P	T 9 1 S 0 1 S 0 2	
30	D030	100,000	P	T 9 1 S 0 1 S 0 2	
31	D031	100,000	P	T 9 1 S 0 1 S 0 2	
32	D032	1,000,000	P	T 9 1 S 0 1 S 0 2	
33	D033	5,000,000	P	T 9 1 S 0 1 S 0 2	
34	D034	5,000,000	P	T 9 1 S 0 1 S 0 2	
35	D035	10,000,000	P	T 9 1 S 0 1 S 0 2	
36	D036	1,000,000	P	T 9 1 S 0 1 S 0 2	

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10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
37	D037	100,000	P	T 9 1 S 0 1 S 0 2	
38	D038	100,000	P	T 9 1 S 0 1 S 0 2	
39	D039	5,000,000	P	T 9 1 S 0 1 S 0 2	
40	D040	1,000,000	P	T 9 1 S 0 1 S 0 2	
41	D041	100,000	P	T 9 1 S 0 1 S 0 2	
42	D042	100,000	P	T 9 1 S 0 1 S 0 2	
43	D043	5,000,000	P	T 9 1 S 0 1 S 0 2	
44	F001	10,000,000	P	T 9 1 S 0 1 S 0 2	
45	F002	10,000,000	P	T 9 1 S 0 1 S 0 2	
46	F003	10,000,000	P	T 9 1 S 0 1 S 0 2	
47	F004	1,000,000	P	T 9 1 S 0 1 S 0 2	
48	F005	10,000,000	P	T 9 1 S 0 1 S 0 2	
49	F006	100,000	P	T 9 1 S 0 1 S 0 2	
50	F007	100,000	P	T 9 1 S 0 1 S 0 2	
51	F008	100,000	P	T 9 1 S 0 1 S 0 2	
52	F009	100,000	P	T 9 1 S 0 1 S 0 2	
53	F010	100,000	P	T 9 1 S 0 1 S 0 2	
54	F011	100,000	P	T 9 1 S 0 1 S 0 2	
55	F012	100,000	P	T 9 1 S 0 1 S 0 2	
56	F019	100,000	P	T 9 1 S 0 1 S 0 2	
57	F024	1,000,000	P	T 9 1 S 0 1 S 0 2	
58	F025	100,000	P	T 9 1 S 0 1 S 0 2	
59	F028	100,000	P	T 9 1 S 0 1 S 0 2	
60	F032	10,000	P	T 9 1 S 0 1 S 0 2	
61	F034	10,000	P	T 9 1 S 0 1 S 0 2	
62	F035	10,000	P	T 9 1 S 0 1 S 0 2	
63	F037	10,000	P	T 9 1 S 0 1 S 0 2	
64	F038	10,000	P	T 9 1 S 0 1 S 0 2	
65	F039	1,000,000	P	T 9 1 S 0 1 S 0 2	
66	K001	10,000	P	T 9 1 S 0 1 S 0 2	
67	K002	100,000	P	T 9 1 S 0 1 S 0 2	
68	K003	100,000	P	T 9 1 S 0 1 S 0 2	
69	K004	100,000	P	T 9 1 S 0 1 S 0 2	
70	K005	100,000	P	T 9 1 S 0 1 S 0 2	
71	K006	100,000	P	T 9 1 S 0 1 S 0 2	
72	K007	100,000	P	T 9 1 S 0 1 S 0 2	

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10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
7 3	K008	100,000	P	T 9 1 S 0 1 S 0 2	
7 4	K009	10,000	P	T 9 1 S 0 1 S 0 2	
7 5	K010	10,000	P	T 9 1 S 0 1 S 0 2	
7 6	K011	10,000	P	T 9 1 S 0 1 S 0 2	
7 7	K013	10,000	P	T 9 1 S 0 1 S 0 2	
7 8	K014	10,000	P	T 9 1 S 0 1 S 0 2	
7 9	K015	10,000	P	T 9 1 S 0 1 S 0 2	
8 0	K016	10,000	P	T 9 1 S 0 1 S 0 2	
8 1	K017	10,000	P	T 9 1 S 0 1 S 0 2	
8 2	K018	10,000	P	T 9 1 S 0 1 S 0 2	
8 3	K019	10,000	P	T 9 1 S 0 1 S 0 2	
8 4	K020	10,000	P	T 9 1 S 0 1 S 0 2	
8 5	K021	10,000	P	T 9 1 S 0 1 S 0 2	
8 6	K022	15,000,000	P	T 9 1 S 0 1 S 0 2	
8 7	K023	10,000	P	T 9 1 S 0 1 S 0 2	
8 8	K024	10,000	P	T 9 1 S 0 1 S 0 2	
8 9	K025	10,000	P	T 9 1 S 0 1 S 0 2	
9 0	K026	10,000	P	T 9 1 S 0 1 S 0 2	
9 1	K027	10,000,000	P	T 9 1 S 0 1 S 0 2	
9 2	K028	10,000	P	T 9 1 S 0 1 S 0 2	
9 3	K029	10,000	P	T 9 1 S 0 1 S 0 2	
9 4	K030	10,000	P	T 9 1 S 0 1 S 0 2	
9 5	K031	10,000	P	T 9 1 S 0 1 S 0 2	
9 6	K032	10,000	P	T 9 1 S 0 1 S 0 2	
9 7	K033	10,000	P	T 9 1 S 0 1 S 0 2	
9 8	K034	10,000	P	T 9 1 S 0 1 S 0 2	
9 9	K035	10,000	P	T 9 1 S 0 1 S 0 2	
10 0	K036	10,000	P	T 9 1 S 0 1 S 0 2	
10 1	K037	10,000	P	T 9 1 S 0 1 S 0 2	
10 2	K038	10,000	P	T 9 1 S 0 1 S 0 2	
10 3	K039	10,000	P	T 9 1 S 0 1 S 0 2	
10 4	K040	10,000	P	T 9 1 S 0 1 S 0 2	
10 5	K041	10,000	P	T 9 1 S 0 1 S 0 2	
10 6	K042	10,000	P	T 9 1 S 0 1 S 0 2	
10 7	K043	10,000	P	T 9 1 S 0 1 S 0 2	
10 8	K044	10,000	P	T 9 1 S 0 1 S 0 2	

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10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
10 9	K045	10,000	P	T 9 1 S 0 1 S 0 2	
11 0	K046	10,000	P	T 9 1 S 0 1 S 0 2	
11 1	K047	10,000	P	T 9 1 S 0 1 S 0 2	
11 2	K048	10,000	P	T 9 1 S 0 1 S 0 2	
11 3	K049	10,000	P	T 9 1 S 0 1 S 0 2	
11 4	K050	10,000	P	T 9 1 S 0 1 S 0 2	
11 5	K051	10,000	P	T 9 1 S 0 1 S 0 2	
11 6	K052	10,000	P	T 9 1 S 0 1 S 0 2	
11 7	K060	10,000	P	T 9 1 S 0 1 S 0 2	
11 8	K061	10,000	P	T 9 1 S 0 1 S 0 2	
11 9	K062	10,000	P	T 9 1 S 0 1 S 0 2	
12 0	K069	10,000	P	T 9 1 S 0 1 S 0 2	
12 1	K071	10,000	P	T 9 1 S 0 1 S 0 2	
12 2	K073	10,000	P	T 9 1 S 0 1 S 0 2	
12 3	K083	100,000	P	T 9 1 S 0 1 S 0 2	
12 4	K084	10,000	P	T 9 1 S 0 1 S 0 2	
12 5	K085	10,000	P	T 9 1 S 0 1 S 0 2	
12 6	K086	10,000	P	T 9 1 S 0 1 S 0 2	
12 7	K087	10,000	P	T 9 1 S 0 1 S 0 2	
12 8	K088	10,000	P	T 9 1 S 0 1 S 0 2	
12 9	K093	5,000,000	P	T 9 1 S 0 1 S 0 2	
13 0	K094	5,000,000	P	T 9 1 S 0 1 S 0 2	
13 1	K095	10,000	P	T 9 1 S 0 1 S 0 2	
13 2	K096	10,000	P	T 9 1 S 0 1 S 0 2	
13 3	K097	10,000	P	T 9 1 S 0 1 S 0 2	
13 4	K098	10,000	P	T 9 1 S 0 1 S 0 2	
13 5	K099	10,000	P	T 9 1 S 0 1 S 0 2	
13 6	K100	10,000	P	T 9 1 S 0 1 S 0 2	
13 7	K101	10,000	P	T 9 1 S 0 1 S 0 2	
13 8	K102	10,000	P	T 9 1 S 0 1 S 0 2	
13 9	K103	100,000	P	T 9 1 S 0 1 S 0 2	
14 0	K104	1,000,000	P	T 9 1 S 0 1 S 0 2	
14 1	K105	10,000	P	T 9 1 S 0 1 S 0 2	
14 2	K106	10,000	P	T 9 1 S 0 1 S 0 2	
14 3	K107	10,000	P	T 9 1 S 0 1 S 0 2	
14 4	K108	10,000	P	T 9 1 S 0 1 S 0 2	

EPA ID NO: L A D 0 0 8 1 6 1 2 3 4

10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
14 5	K109	10,000	P	T 9 1 S 0 1 S 0 2	
14 6	K110	10,000	P	T 9 1 S 0 1 S 0 2	
14 7	K111	10,000	P	T 9 1 S 0 1 S 0 2	
14 8	K112	10,000	P	T 9 1 S 0 1 S 0 2	
14 9	K113	1,000,000	P	T 9 1 S 0 1 S 0 2	
15 0	K114	1,000,000	P	T 9 1 S 0 1 S 0 2	
15 1	K115	100,000	P	T 9 1 S 0 1 S 0 2	
15 2	K116	5,000,000	P	T 9 1 S 0 1 S 0 2	
15 3	K117	10,000	P	T 9 1 S 0 1 S 0 2	
15 4	K118	10,000	P	T 9 1 S 0 1 S 0 2	
15 5	K123	10,000	P	T 9 1 S 0 1 S 0 2	
15 6	K124	10,000	P	T 9 1 S 0 1 S 0 2	
15 7	K125	10,000	P	T 9 1 S 0 1 S 0 2	
15 8	K126	10,000	P	T 9 1 S 0 1 S 0 2	
15 9	K131	10,000	P	T 9 1 S 0 1 S 0 2	
16 0	K132	10,000	P	T 9 1 S 0 1 S 0 2	
16 1	K136	10,000	P	T 9 1 S 0 1 S 0 2	
16 2	K141	10,000	P	T 9 1 S 0 1 S 0 2	
16 3	K142	10,000	P	T 9 1 S 0 1 S 0 2	
16 4	K143	10,000	P	T 9 1 S 0 1 S 0 2	
16 5	K144	10,000	P	T 9 1 S 0 1 S 0 2	
16 6	K145	10,000	P	T 9 1 S 0 1 S 0 2	
16 7	K147	10,000	P	T 9 1 S 0 1 S 0 2	
16 8	K148	10,000	P	T 9 1 S 0 1 S 0 2	
16 9	K149	10,000	P	T 9 1 S 0 1 S 0 2	
17 0	K150	10,000	P	T 9 1 S 0 1 S 0 2	
17 1	K151	10,000	P	T 9 1 S 0 1 S 0 2	
17 2	K156	10,000	P	T 9 1 S 0 1 S 0 2	
17 3	K157	10,000	P	T 9 1 S 0 1 S 0 2	
17 4	K158	10,000	P	T 9 1 S 0 1 S 0 2	
17 5	K159	10,000	P	T 9 1 S 0 1 S 0 2	
17 6	K161	10,000	P	T 9 1 S 0 1 S 0 2	
17 7	K169	10,000	P	T 9 1 S 0 1 S 0 2	
17 8	K170	10,000	P	T 9 1 S 0 1 S 0 2	
17 9	K171	10,000	P	T 9 1 S 0 1 S 0 2	
18 0	K172	10,000	P	T 9 1 S 0 1 S 0 2	

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10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number		A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
18	1	K174	10,000	P	T	9	1	S	0	1	S	0	2	
18	2	K175	10,000	P	T	9	1	S	0	1	S	0	2	
18	3	K176	10,000	P	T	9	1	S	0	1	S	0	2	
18	4	K177	10,000	P	T	9	1	S	0	1	S	0	2	
18	5	K178	10,000	P	T	9	1	S	0	1	S	0	2	
18	6	K181	10,000	P	T	9	1	S	0	1	S	0	2	
18	7	P001	10,000	P	T	9	1	S	0	1	S	0	2	
18	8	P002	10,000	P	T	9	1	S	0	1	S	0	2	
18	9	P003	10,000	P	T	9	1	S	0	1	S	0	2	
19	0	P004	10,000	P	T	9	1	S	0	1	S	0	2	
19	1	P005	10,000	P	T	9	1	S	0	1	S	0	2	
19	2	P006	10,000	P	T	9	1	S	0	1	S	0	2	
19	3	P007	10,000	P	T	9	1	S	0	1	S	0	2	
19	4	P008	10,000	P	T	9	1	S	0	1	S	0	2	
19	5	P009	10,000	P	T	9	1	S	0	1	S	0	2	
19	6	P010	10,000	P	T	9	1	S	0	1	S	0	2	
19	7	P011	10,000	P	T	9	1	S	0	1	S	0	2	
19	8	P012	10,000	P	T	9	1	S	0	1	S	0	2	
19	9	P013	10,000	P	T	9	1	S	0	1	S	0	2	
20	0	P014	10,000	P	T	9	1	S	0	1	S	0	2	
20	1	P015	10,000	P	T	9	1	S	0	1	S	0	2	
20	2	P016	10,000	P	T	9	1	S	0	1	S	0	2	
20	3	P017	10,000	P	T	9	1	S	0	1	S	0	2	
20	4	P018	10,000	P	T	9	1	S	0	1	S	0	2	
20	5	P020	10,000	P	T	9	1	S	0	1	S	0	2	
20	6	P021	10,000	P	T	9	1	S	0	1	S	0	2	
20	7	P022	100,000	P	T	9	1	S	0	1	S	0	2	
20	8	P023	10,000	P	T	9	1	S	0	1	S	0	2	
20	9	P024	10,000	P	T	9	1	S	0	1	S	0	2	
21	0	P026	10,000	P	T	9	1	S	0	1	S	0	2	
21	1	P027	10,000	P	T	9	1	S	0	1	S	0	2	
21	2	P028	10,000	P	T	9	1	S	0	1	S	0	2	
21	3	P029	10,000	P	T	9	1	S	0	1	S	0	2	
21	4	P030	10,000	P	T	9	1	S	0	1	S	0	2	
21	5	P031	10,000	P	T	9	1	S	0	1	S	0	2	
21	6	P033	10,000	P	T	9	1	S	0	1	S	0	2	

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10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
21 7	P034	10,000	P	T 9 1 S 0 1 S 0 2	
21 8	P036	10,000	P	T 9 1 S 0 1 S 0 2	
21 9	P037	10,000	P	T 9 1 S 0 1 S 0 2	
22 0	P038	10,000	P	T 9 1 S 0 1 S 0 2	
22 1	P039	10,000	P	T 9 1 S 0 1 S 0 2	
22 2	P040	10,000	P	T 9 1 S 0 1 S 0 2	
22 3	P041	10,000	P	T 9 1 S 0 1 S 0 2	
22 4	P042	10,000	P	T 9 1 S 0 1 S 0 2	
22 5	P043	10,000	P	T 9 1 S 0 1 S 0 2	
22 6	P044	10,000	P	T 9 1 S 0 1 S 0 2	
22 7	P045	10,000	P	T 9 1 S 0 1 S 0 2	
22 8	P046	10,000	P	T 9 1 S 0 1 S 0 2	
22 9	P047	10,000	P	T 9 1 S 0 1 S 0 2	
23 0	P048	10,000	P	T 9 1 S 0 1 S 0 2	
23 1	P049	10,000	P	T 9 1 S 0 1 S 0 2	
23 2	P050	10,000	P	T 9 1 S 0 1 S 0 2	
23 3	P051	10,000	P	T 9 1 S 0 1 S 0 2	
23 4	P054	10,000	P	T 9 1 S 0 1 S 0 2	
23 5	P056	10,000	P	T 9 1 S 0 1 S 0 2	
23 6	P057	10,000	P	T 9 1 S 0 1 S 0 2	
23 7	P058	10,000	P	T 9 1 S 0 1 S 0 2	
23 8	P059	10,000	P	T 9 1 S 0 1 S 0 2	
23 9	P060	10,000	P	T 9 1 S 0 1 S 0 2	
24 0	P062	10,000	P	T 9 1 S 0 1 S 0 2	
24 1	P063	10,000	P	T 9 1 S 0 1 S 0 2	
24 2	P064	10,000	P	T 9 1 S 0 1 S 0 2	
24 3	P065	10,000	P	T 9 1 S 0 1 S 0 2	
24 4	P066	10,000	P	T 9 1 S 0 1 S 0 2	
24 5	P067	10,000	P	T 9 1 S 0 1 S 0 2	
24 6	P068	10,000	P	T 9 1 S 0 1 S 0 2	
24 7	P069	10,000	P	T 9 1 S 0 1 S 0 2	
24 8	P070	10,000	P	T 9 1 S 0 1 S 0 2	
24 9	P071	10,000	P	T 9 1 S 0 1 S 0 2	
25 0	P072	10,000	P	T 9 1 S 0 1 S 0 2	
25 1	P073	10,000	P	T 9 1 S 0 1 S 0 2	
25 2	P074	10,000	P	T 9 1 S 0 1 S 0 2	

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10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
25 3	P075	10,000	P	T 9 1 S 0 1 S 0 2	
25 4	P076	10,000	P	T 9 1 S 0 1 S 0 2	
25 5	P077	10,000	P	T 9 1 S 0 1 S 0 2	
25 6	P078	10,000	P	T 9 1 S 0 1 S 0 2	
25 7	P081	10,000	P	T 9 1 S 0 1 S 0 2	
25 8	P082	10,000	P	T 9 1 S 0 1 S 0 2	
25 9	P084	10,000	P	T 9 1 S 0 1 S 0 2	
26 0	P085	10,000	P	T 9 1 S 0 1 S 0 2	
26 1	P087	10,000	P	T 9 1 S 0 1 S 0 2	
26 2	P088	10,000	P	T 9 1 S 0 1 S 0 2	
26 3	P089	10,000	P	T 9 1 S 0 1 S 0 2	
26 4	P092	10,000	P	T 9 1 S 0 1 S 0 2	
26 5	P093	10,000	P	T 9 1 S 0 1 S 0 2	
26 6	P094	10,000	P	T 9 1 S 0 1 S 0 2	
26 7	P095	10,000	P	T 9 1 S 0 1 S 0 2	
26 8	P096	10,000	P	T 9 1 S 0 1 S 0 2	
26 9	P097	10,000	P	T 9 1 S 0 1 S 0 2	
27 0	P098	10,000	P	T 9 1 S 0 1 S 0 2	
27 1	P099	10,000	P	T 9 1 S 0 1 S 0 2	
27 2	P101	10,000	P	T 9 1 S 0 1 S 0 2	
27 3	P102	10,000	P	T 9 1 S 0 1 S 0 2	
27 4	P103	10,000	P	T 9 1 S 0 1 S 0 2	
27 5	P104	10,000	P	T 9 1 S 0 1 S 0 2	
27 6	P105	10,000	P	T 9 1 S 0 1 S 0 2	
27 7	P106	10,000	P	T 9 1 S 0 1 S 0 2	
27 8	P108	10,000	P	T 9 1 S 0 1 S 0 2	
27 9	P109	10,000	P	T 9 1 S 0 1 S 0 2	
28 0	P110	10,000	P	T 9 1 S 0 1 S 0 2	
28 1	P111	10,000	P	T 9 1 S 0 1 S 0 2	
28 2	P112	10,000	P	T 9 1 S 0 1 S 0 2	
28 3	P113	10,000	P	T 9 1 S 0 1 S 0 2	
28 4	P114	10,000	P	T 9 1 S 0 1 S 0 2	
28 5	P115	10,000	P	T 9 1 S 0 1 S 0 2	
28 6	P116	10,000	P	T 9 1 S 0 1 S 0 2	
28 7	P118	10,000	P	T 9 1 S 0 1 S 0 2	
28 8	P119	10,000	P	T 9 1 S 0 1 S 0 2	

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10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
28 9	P120	10,000	P	T 9 1 S 0 1 S 0 2	
29 0	P121	10,000	P	T 9 1 S 0 1 S 0 2	
29 1	P122	10,000	P	T 9 1 S 0 1 S 0 2	
29 2	P123	10,000	P	T 9 1 S 0 1 S 0 2	
29 3	P127	10,000	P	T 9 1 S 0 1 S 0 2	
29 4	P128	10,000	P	T 9 1 S 0 1 S 0 2	
29 5	P185	10,000	P	T 9 1 S 0 1 S 0 2	
29 6	P188	10,000	P	T 9 1 S 0 1 S 0 2	
29 7	P189	10,000	P	T 9 1 S 0 1 S 0 2	
29 8	P190	10,000	P	T 9 1 S 0 1 S 0 2	
29 9	P191	10,000	P	T 9 1 S 0 1 S 0 2	
30 0	P192	10,000	P	T 9 1 S 0 1 S 0 2	
30 1	P194	10,000	P	T 9 1 S 0 1 S 0 2	
30 2	P196	10,000	P	T 9 1 S 0 1 S 0 2	
30 3	P197	10,000	P	T 9 1 S 0 1 S 0 2	
30 4	P198	10,000	P	T 9 1 S 0 1 S 0 2	
30 5	P199	10,000	P	T 9 1 S 0 1 S 0 2	
30 6	P201	10,000	P	T 9 1 S 0 1 S 0 2	
30 7	P202	10,000	P	T 9 1 S 0 1 S 0 2	
30 8	P203	10,000	P	T 9 1 S 0 1 S 0 2	
30 9	P204	10,000	P	T 9 1 S 0 1 S 0 2	
31 0	P205	10,000	P	T 9 1 S 0 1 S 0 2	
31 1	U001	10,000	P	T 9 1 S 0 1 S 0 2	
31 2	U002	10,000	P	T 9 1 S 0 1 S 0 2	
31 3	U003	1,000,000	P	T 9 1 S 0 1 S 0 2	
31 4	U004	10,000	P	T 9 1 S 0 1 S 0 2	
31 5	U005	10,000	P	T 9 1 S 0 1 S 0 2	
31 6	U006	10,000	P	T 9 1 S 0 1 S 0 2	
31 7	U007	10,000	P	T 9 1 S 0 1 S 0 2	
31 8	U008	10,000	P	T 9 1 S 0 1 S 0 2	
31 9	U009	10,000	P	T 9 1 S 0 1 S 0 2	
32 0	U010	10,000	P	T 9 1 S 0 1 S 0 2	
32 1	U011	10,000	P	T 9 1 S 0 1 S 0 2	
32 2	U012	1,000,000	P	T 9 1 S 0 1 S 0 2	
32 3	U014	10,000	P	T 9 1 S 0 1 S 0 2	
32 4	U015	10,000	P	T 9 1 S 0 1 S 0 2	

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10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
32 5	U016	10,000	P	T 9 1 S 0 1 S 0 2	
32 6	U017	10,000	P	T 9 1 S 0 1 S 0 2	
32 7	U018	10,000	P	T 9 1 S 0 1 S 0 2	
32 8	U019	10,000	P	T 9 1 S 0 1 S 0 2	
32 9	U020	10,000	P	T 9 1 S 0 1 S 0 2	
33 0	U021	10,000	P	T 9 1 S 0 1 S 0 2	
33 1	U022	10,000	P	T 9 1 S 0 1 S 0 2	
33 2	U023	10,000	P	T 9 1 S 0 1 S 0 2	
33 3	U024	10,000	P	T 9 1 S 0 1 S 0 2	
33 4	U025	10,000	P	T 9 1 S 0 1 S 0 2	
33 5	U026	10,000	P	T 9 1 S 0 1 S 0 2	
33 6	U027	10,000	P	T 9 1 S 0 1 S 0 2	
33 7	U028	10,000	P	T 9 1 S 0 1 S 0 2	
33 8	U029	10,000	P	T 9 1 S 0 1 S 0 2	
33 9	U030	10,000	P	T 9 1 S 0 1 S 0 2	
34 0	U031	10,000	P	T 9 1 S 0 1 S 0 2	
34 1	U032	10,000	P	T 9 1 S 0 1 S 0 2	
34 2	U033	10,000	P	T 9 1 S 0 1 S 0 2	
34 3	U034	10,000	P	T 9 1 S 0 1 S 0 2	
34 4	U035	10,000	P	T 9 1 S 0 1 S 0 2	
34 5	U036	10,000	P	T 9 1 S 0 1 S 0 2	
34 6	U037	1,000,000	P	T 9 1 S 0 1 S 0 2	
34 7	U038	10,000	P	T 9 1 S 0 1 S 0 2	
34 8	U039	10,000	P	T 9 1 S 0 1 S 0 2	
34 9	U041	10,000	P	T 9 1 S 0 1 S 0 2	
35 0	U042	10,000	P	T 9 1 S 0 1 S 0 2	
35 1	U043	10,000	P	T 9 1 S 0 1 S 0 2	
35 2	U044	10,000	P	T 9 1 S 0 1 S 0 2	
35 3	U045	10,000	P	T 9 1 S 0 1 S 0 2	
35 4	U046	10,000	P	T 9 1 S 0 1 S 0 2	
35 5	U047	10,000	P	T 9 1 S 0 1 S 0 2	
35 6	U048	10,000	P	T 9 1 S 0 1 S 0 2	
35 7	U049	10,000	P	T 9 1 S 0 1 S 0 2	
35 8	U050	10,000	P	T 9 1 S 0 1 S 0 2	
35 9	U051	10,000	P	T 9 1 S 0 1 S 0 2	
36 0	U052	10,000	P	T 9 1 S 0 1 S 0 2	

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10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number		A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
36	1	U053	10,000	P	T	9	1	S	0	1	S	0	2	
36	2	U055	10,000	P	T	9	1	S	0	1	S	0	2	
36	3	U056	10,000	P	T	9	1	S	0	1	S	0	2	
36	4	U057	10,000	P	T	9	1	S	0	1	S	0	2	
36	5	U058	10,000	P	T	9	1	S	0	1	S	0	2	
36	6	U059	10,000	P	T	9	1	S	0	1	S	0	2	
36	7	U060	10,000	P	T	9	1	S	0	1	S	0	2	
36	8	U061	10,000	P	T	9	1	S	0	1	S	0	2	
36	9	U062	10,000	P	T	9	1	S	0	1	S	0	2	
37	0	U063	10,000	P	T	9	1	S	0	1	S	0	2	
37	1	U064	10,000	P	T	9	1	S	0	1	S	0	2	
37	2	U066	10,000	P	T	9	1	S	0	1	S	0	2	
37	3	U067	10,000	P	T	9	1	S	0	1	S	0	2	
37	4	U068	10,000	P	T	9	1	S	0	1	S	0	2	
37	5	U069	10,000	P	T	9	1	S	0	1	S	0	2	
37	6	U070	10,000	P	T	9	1	S	0	1	S	0	2	
37	7	U071	10,000	P	T	9	1	S	0	1	S	0	2	
37	8	U072	10,000	P	T	9	1	S	0	1	S	0	2	
37	9	U073	10,000	P	T	9	1	S	0	1	S	0	2	
38	0	U074	10,000	P	T	9	1	S	0	1	S	0	2	
38	1	U075	10,000	P	T	9	1	S	0	1	S	0	2	
38	2	U076	10,000	P	T	9	1	S	0	1	S	0	2	
38	3	U077	10,000	P	T	9	1	S	0	1	S	0	2	
38	4	U078	10,000	P	T	9	1	S	0	1	S	0	2	
38	5	U079	10,000	P	T	9	1	S	0	1	S	0	2	
38	6	U080	10,000	P	T	9	1	S	0	1	S	0	2	
38	7	U081	10,000	P	T	9	1	S	0	1	S	0	2	
38	8	U082	10,000	P	T	9	1	S	0	1	S	0	2	
38	9	U083	10,000	P	T	9	1	S	0	1	S	0	2	
39	0	U084	10,000	P	T	9	1	S	0	1	S	0	2	
39	1	U085	10,000	P	T	9	1	S	0	1	S	0	2	
39	2	U086	10,000	P	T	9	1	S	0	1	S	0	2	
39	3	U087	10,000	P	T	9	1	S	0	1	S	0	2	
39	4	U088	10,000	P	T	9	1	S	0	1	S	0	2	
39	5	U089	10,000	P	T	9	1	S	0	1	S	0	2	
39	6	U090	10,000	P	T	9	1	S	0	1	S	0	2	

EPA ID NO: L A D 0 0 8 1 6 1 2 3 4

10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
39 7	U091	10,000	P	T 9 1 S 0 1 S 0 2	
39 8	U092	10,000	P	T 9 1 S 0 1 S 0 2	
39 9	U093	10,000	P	T 9 1 S 0 1 S 0 2	
40 0	U094	10,000	P	T 9 1 S 0 1 S 0 2	
40 1	U095	10,000	P	T 9 1 S 0 1 S 0 2	
40 2	U096	10,000	P	T 9 1 S 0 1 S 0 2	
40 3	U097	10,000	P	T 9 1 S 0 1 S 0 2	
40 4	U098	1,000,000	P	T 9 1 S 0 1 S 0 2	
40 5	U099	10,000	P	T 9 1 S 0 1 S 0 2	
40 6	U101	10,000	P	T 9 1 S 0 1 S 0 2	
40 7	U102	10,000	P	T 9 1 S 0 1 S 0 2	
40 8	U103	10,000	P	T 9 1 S 0 1 S 0 2	
40 9	U105	10,000	P	T 9 1 S 0 1 S 0 2	
41 0	U106	10,000	P	T 9 1 S 0 1 S 0 2	
41 1	U107	10,000	P	T 9 1 S 0 1 S 0 2	
41 2	U108	10,000	P	T 9 1 S 0 1 S 0 2	
41 3	U109	10,000	P	T 9 1 S 0 1 S 0 2	
41 4	U110	10,000	P	T 9 1 S 0 1 S 0 2	
41 5	U111	10,000	P	T 9 1 S 0 1 S 0 2	
41 6	U112	10,000	P	T 9 1 S 0 1 S 0 2	
41 7	U113	100,000	P	T 9 1 S 0 1 S 0 2	
41 8	U114	10,000	P	T 9 1 S 0 1 S 0 2	
41 9	U115	10,000	P	T 9 1 S 0 1 S 0 2	
42 0	U116	10,000	P	T 9 1 S 0 1 S 0 2	
42 1	U117	10,000	P	T 9 1 S 0 1 S 0 2	
42 2	U118	10,000	P	T 9 1 S 0 1 S 0 2	
42 3	U119	10,000	P	T 9 1 S 0 1 S 0 2	
42 4	U120	10,000	P	T 9 1 S 0 1 S 0 2	
42 5	U121	10,000	P	T 9 1 S 0 1 S 0 2	
42 6	U122	10,000	P	T 9 1 S 0 1 S 0 2	
42 7	U123	10,000	P	T 9 1 S 0 1 S 0 2	
42 8	U124	10,000	P	T 9 1 S 0 1 S 0 2	
42 9	U125	10,000	P	T 9 1 S 0 1 S 0 2	
430	U126	10,000	P	T 9 1 S 0 1 S 0 2	
43 1	U127	10,000	P	T 9 1 S 0 1 S 0 2	
43 2	U128	10,000	P	T 9 1 S 0 1 S 0 2	

EPA ID NO: L A D 0 0 8 1 6 1 2 3 4

10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number		A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
43	3	U129	10,000	P	T	9	1	S	0	1	S	0	2	
43	4	U130	10,000	P	T	9	1	S	0	1	S	0	2	
43	5	U131	10,000	P	T	9	1	S	0	1	S	0	2	
43	6	U132	10,000	P	T	9	1	S	0	1	S	0	2	
43	7	U133	10,000	P	T	9	1	S	0	1	S	0	2	
43	8	U134	10,000	P	T	9	1	S	0	1	S	0	2	
43	9	U135	10,000	P	T	9	1	S	0	1	S	0	2	
44	0	U136	10,000	P	T	9	1	S	0	1	S	0	2	
44	1	U137	10,000	P	T	9	1	S	0	1	S	0	2	
44	2	U138	10,000	P	T	9	1	S	0	1	S	0	2	
44	3	U140	10,000	P	T	9	1	S	0	1	S	0	2	
44	4	U141	10,000	P	T	9	1	S	0	1	S	0	2	
44	5	U142	10,000	P	T	9	1	S	0	1	S	0	2	
44	6	U143	10,000	P	T	9	1	S	0	1	S	0	2	
44	7	U144	10,000	P	T	9	1	S	0	1	S	0	2	
44	8	U145	10,000	P	T	9	1	S	0	1	S	0	2	
44	9	U146	10,000	P	T	9	1	S	0	1	S	0	2	
45	0	U147	100,000	P	T	9	1	S	0	1	S	0	2	
45	1	U148	10,000	P	T	9	1	S	0	1	S	0	2	
45	2	U149	10,000	P	T	9	1	S	0	1	S	0	2	
45	3	U150	10,000	P	T	9	1	S	0	1	S	0	2	
45	4	U151	10,000	P	T	9	1	S	0	1	S	0	2	
45	5	U152	10,000	P	T	9	1	S	0	1	S	0	2	
45	6	U153	10,000	P	T	9	1	S	0	1	S	0	2	
45	7	U154	10,000	P	T	9	1	S	0	1	S	0	2	
45	8	U155	10,000	P	T	9	1	S	0	1	S	0	2	
45	9	U156	10,000	P	T	9	1	S	0	1	S	0	2	
46	0	U157	10,000	P	T	9	1	S	0	1	S	0	2	
46	1	U158	10,000	P	T	9	1	S	0	1	S	0	2	
46	2	U159	10,000	P	T	9	1	S	0	1	S	0	2	
46	3	U160	10,000	P	T	9	1	S	0	1	S	0	2	
46	4	U161	1,000,000	P	T	9	1	S	0	1	S	0	2	
46	5	U162	10,000	P	T	9	1	S	0	1	S	0	2	
46	6	U163	10,000	P	T	9	1	S	0	1	S	0	2	
46	7	U164	10,000	P	T	9	1	S	0	1	S	0	2	
46	8	U165	10,000	P	T	9	1	S	0	1	S	0	2	

EPA ID NO: L A D 0 0 8 1 6 1 2 3 4

10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
46 9	U166	10,000	P	T 9 1 S 0 1 S 0 2	
47 0	U167	10,000	P	T 9 1 S 0 1 S 0 2	
47 1	U168	10,000	P	T 9 1 S 0 1 S 0 2	
47 2	U169	10,000	P	T 9 1 S 0 1 S 0 2	
47 3	U170	1,000,000	P	T 9 1 S 0 1 S 0 2	
47 4	U171	10,000	P	T 9 1 S 0 1 S 0 2	
47 5	U172	10,000	P	T 9 1 S 0 1 S 0 2	
47 6	U173	10,000	P	T 9 1 S 0 1 S 0 2	
47 7	U174	10,000	P	T 9 1 S 0 1 S 0 2	
47 8	U176	10,000	P	T 9 1 S 0 1 S 0 2	
47 9	U177	10,000	P	T 9 1 S 0 1 S 0 2	
48 0	U178	10,000	P	T 9 1 S 0 1 S 0 2	
48 1	U179	10,000	P	T 9 1 S 0 1 S 0 2	
48 2	U180	10,000	P	T 9 1 S 0 1 S 0 2	
48 3	U181	10,000	P	T 9 1 S 0 1 S 0 2	
48 4	U182	10,000	P	T 9 1 S 0 1 S 0 2	
48 5	U183	10,000	P	T 9 1 S 0 1 S 0 2	
48 6	U184	10,000	P	T 9 1 S 0 1 S 0 2	
48 7	U185	10,000	P	T 9 1 S 0 1 S 0 2	
48 8	U186	10,000	P	T 9 1 S 0 1 S 0 2	
48 9	U187	10,000	P	T 9 1 S 0 1 S 0 2	
49 0	U188	10,000	P	T 9 1 S 0 1 S 0 2	
49 1	U189	10,000	P	T 9 1 S 0 1 S 0 2	
49 2	U190	5,000,000	P	T 9 1 S 0 1 S 0 2	
49 3	U191	10,000	P	T 9 1 S 0 1 S 0 2	
49 4	U192	10,000	P	T 9 1 S 0 1 S 0 2	
49 5	U193	10,000	P	T 9 1 S 0 1 S 0 2	
49 6	U194	10,000	P	T 9 1 S 0 1 S 0 2	
49 7	U196	10,000	P	T 9 1 S 0 1 S 0 2	
49 8	U197	10,000	P	T 9 1 S 0 1 S 0 2	
49 9	U200	10,000	P	T 9 1 S 0 1 S 0 2	
50 0	U201	10,000	P	T 9 1 S 0 1 S 0 2	
50 1	U202	10,000	P	T 9 1 S 0 1 S 0 2	
50 2	U203	10,000	P	T 9 1 S 0 1 S 0 2	
50 3	U204	10,000	P	T 9 1 S 0 1 S 0 2	
50 4	U205	10,000	P	T 9 1 S 0 1 S 0 2	

EPA ID NO: L A D 0 0 8 1 6 1 2 3 4

10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
50 5	U206	10,000	P	T 9 1 S 0 1 S 0 2	
50 6	U207	10,000	P	T 9 1 S 0 1 S 0 2	
50 7	U208	10,000	P	T 9 1 S 0 1 S 0 2	
50 8	U209	10,000	P	T 9 1 S 0 1 S 0 2	
50 9	U210	10,000	P	T 9 1 S 0 1 S 0 2	
51 0	U211	10,000	P	T 9 1 S 0 1 S 0 2	
51 1	U213	10,000	P	T 9 1 S 0 1 S 0 2	
51 2	U214	10,000	P	T 9 1 S 0 1 S 0 2	
51 3	U215	10,000	P	T 9 1 S 0 1 S 0 2	
51 4	U216	10,000	P	T 9 1 S 0 1 S 0 2	
51 5	U217	10,000	P	T 9 1 S 0 1 S 0 2	
51 6	U218	10,000	P	T 9 1 S 0 1 S 0 2	
51 7	U219	10,000	P	T 9 1 S 0 1 S 0 2	
51 8	U220	1,000,000	P	T 9 1 S 0 1 S 0 2	
51 9	U221	1,000,000	P	T 9 1 S 0 1 S 0 2	
52 0	U222	10,000	P	T 9 1 S 0 1 S 0 2	
52 1	U223	10,000	P	T 9 1 S 0 1 S 0 2	
52 2	U225	10,000	P	T 9 1 S 0 1 S 0 2	
52 3	U226	10,000	P	T 9 1 S 0 1 S 0 2	
52 4	U227	10,000	P	T 9 1 S 0 1 S 0 2	
52 5	U228	10,000	P	T 9 1 S 0 1 S 0 2	
52 6	U234	10,000	P	T 9 1 S 0 1 S 0 2	
52 7	U235	10,000	P	T 9 1 S 0 1 S 0 2	
52 8	U236	10,000	P	T 9 1 S 0 1 S 0 2	
52 9	U237	10,000	P	T 9 1 S 0 1 S 0 2	
53 0	U238	10,000	P	T 9 1 S 0 1 S 0 2	
53 1	U239	10,000	P	T 9 1 S 0 1 S 0 2	
53 2	U240	10,000	P	T 9 1 S 0 1 S 0 2	
53 3	U243	10,000	P	T 9 1 S 0 1 S 0 2	
53 4	U244	10,000	P	T 9 1 S 0 1 S 0 2	
53 5	U246	10,000	P	T 9 1 S 0 1 S 0 2	
53 6	U247	10,000	P	T 9 1 S 0 1 S 0 2	
53 7	U248	10,000	P	T 9 1 S 0 1 S 0 2	
53 8	U249	10,000	P	T 9 1 S 0 1 S 0 2	
53 9	U271	10,000	P	T 9 1 S 0 1 S 0 2	
54 0	U278	10,000	P	T 9 1 S 0 1 S 0 2	

EPA ID NO: L A D 0 0 8 1 6 1 2 3 4

10. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number		A. Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity Of Waste	C. Unit of Measure (Enter Code)	D. PROCESSES (1) PROCESS CODES (Enter Code)									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
54	1	U279	10,000	P	T	9	1	S	0	1	S	0	2	
54	2	U280	10,000	P	T	9	1	S	0	1	S	0	2	
54	3	U328	10,000	P	T	9	1	S	0	1	S	0	2	
54	4	U353	10,000	P	T	9	1	S	0	1	S	0	2	
54	5	U359	10,000	P	T	9	1	S	0	1	S	0	2	
54	6	U364	10,000	P	T	9	1	S	0	1	S	0	2	
54	7	U367	10,000	P	T	9	1	S	0	1	S	0	2	
54	8	U372	10,000	P	T	9	1	S	0	1	S	0	2	
54	9	U373	10,000	P	T	9	1	S	0	1	S	0	2	
55	0	U387	10,000	P	T	9	1	S	0	1	S	0	2	
55	1	U389	10,000	P	T	9	1	S	0	1	S	0	2	
55	2	U394	10,000	P	T	9	1	S	0	1	S	0	2	
55	3	U395	10,000	P	T	9	1	S	0	1	S	0	2	
55	4	U404	10,000	P	T	9	1	S	0	1	S	0	2	
55	5	U407	10,000	P	T	9	1	S	0	1	S	0	2	
55	6	U409	10,000	P	T	9	1	S	0	1	S	0	2	
55	7	U410	10,000	P	T	9	1	S	0	1	S	0	2	
55	8	U411	10,000	P	T	9	1	S	0	1	S	0	2	

EPA ID NO: I_L__I_A__I_D__I I_0__I_0__I_8__I I_1__I 6_I_1__I I_2__I_3__I_4__I

11. Map (See instructions on pages 25 and 26)

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

12. Facility Drawing (See instructions on page 26)

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

13. Photographs (See instructions on page 26)

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

14. Comments (See instructions on page 26)

1. Unit No. 2 (Line Process Code 02 T91) has a sulfuric acid production capacity of 1,900 tons per day, of which 1,200 tons day is associated with spent acid regeneration.

HAZARDOUS WASTE PERMIT INFORMATION FORM-Continuation

11. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area.

SEE ATTACHED SITE LOCATION MAP.

HAZARDOUS WASTE PERMIT INFORMATION FORM-Continuation

12. Facility Diagram

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

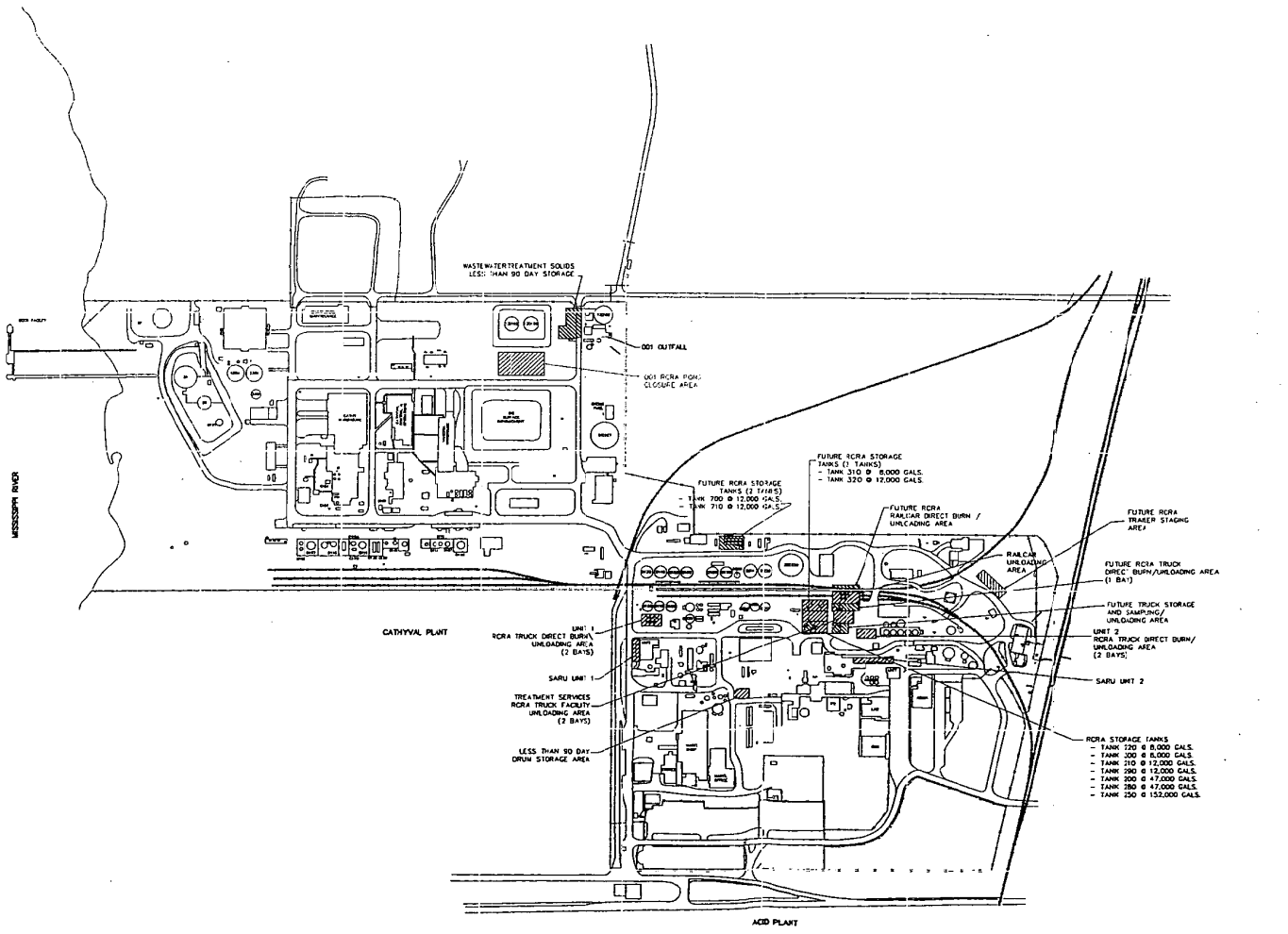
SEE ATTACHED FACILTIY PLOT PLAN.

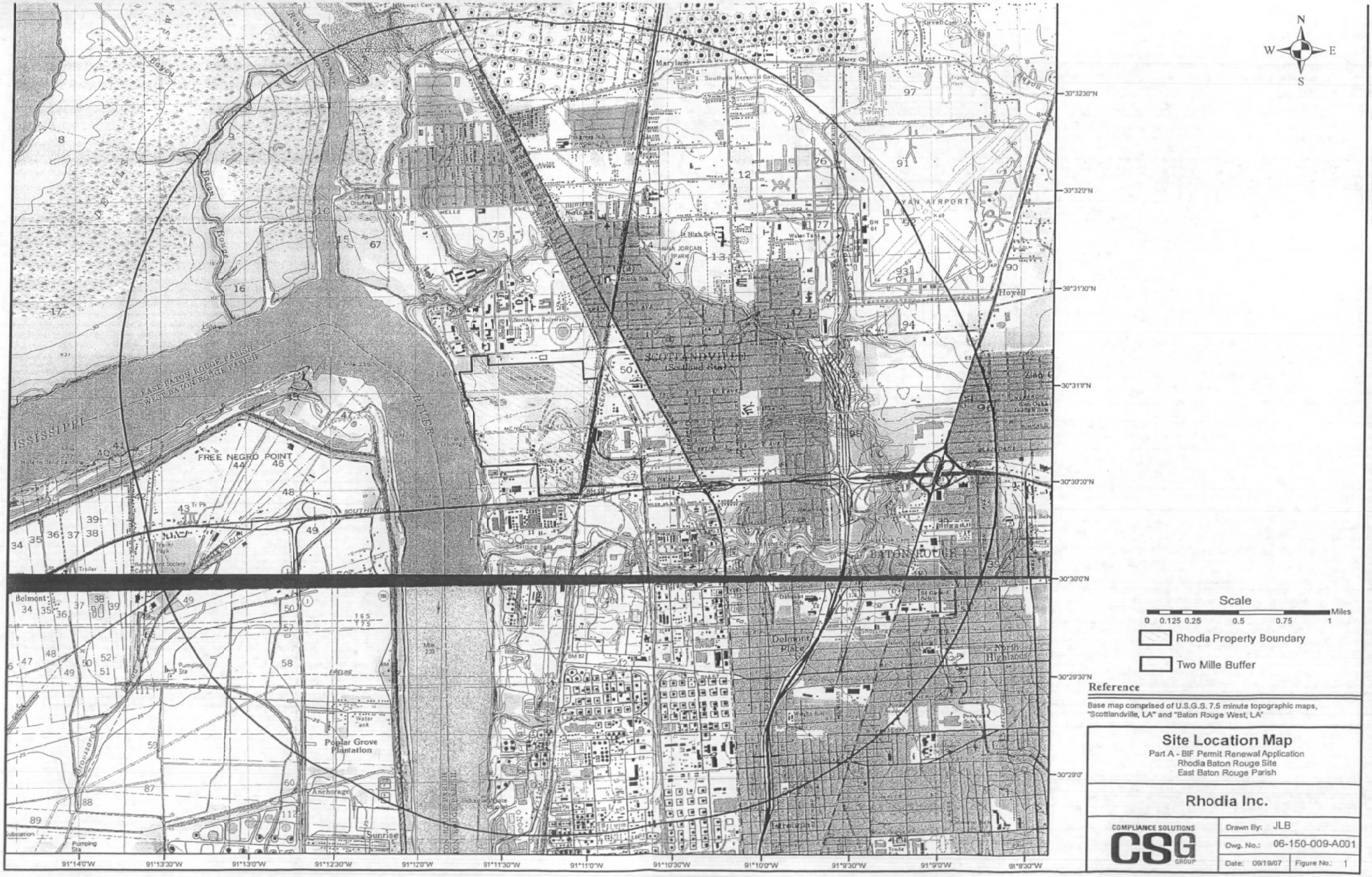
HAZARDOUS WASTE PERMIT INFORMATION FORM-Continuation

13. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas.

SEE ATTACHED 2005 AERIAL PHOTOGRAPH.





Reference

Base map comprised of U.S.G.S. 7.5 minute topographic maps, "Scottlandville, LA" and "Baton Rouge West, LA"

Site Location Map

Part A - BIF Permit Renewal Application
Rhodia Baton Rouge Site
East Baton Rouge Parish

Rhodia Inc.

COMPLIANCE SOLUTIONS CSG GROUP

Drawn By:	JLB
Dwg. No.:	06-150-009-A001
Date: 09/19/07	Figure No.: 1

Scale

0 250 500 1,000 1,500 2,000 Feet

Rhodia Property Boundary

N
W E
S

Reference

Base map comprised of 2005 U.S.G.S.DOQQ Aerial Photos,
"Scottlandville SE", "Scottlandville SW",
"Baton Rouge West NE", "Baton Rouge West NW"

2005 Aerial Photograph

Part A - BIF Renewal Application
Rhodia Baton Rouge Site
East Baton Rouge Parish

Rhodia Inc.

COMPLIANCE SOLUTIONS CSG GROUP

Drawn By:	JLB
Dwg. No.:	06-150-009-A002
Date: 09/01/07	Figure No.: 2

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BODY
OF PERMIT

DRAFT
HAZARDOUS WASTE OPERATING RENEWAL PERMIT

Rhodia, Inc
EPA ID# LAD008161234
Agency Interest# 1314

East Baton Rouge Parish
Baton Rouge, Louisiana
PER19980003
Permit Number LAD008161234-OP-RN-1

I. PERMIT PREAMBLE

This permit is issued to Rhodia Inc., hereinafter referred to as the Permittee, by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et seq., and the regulations adopted thereunder.

For the purposes of the permit, "Administrative Authority" shall mean the Secretary of the Department of Environmental Quality, or his/her designee.

This permit is based on information submitted in the permit application, and all subsequent amendments, and on the applicant's certification that such information is accurate and that all facilities were or will be maintained and operated as specified in the application.

This permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et. Seq., and the regulations adopted thereunder.

GLOSSARY OF TERMS

For the purpose of this Permit, terms used herein shall have the same meaning as those in LAC 33:V.Subpart 1 unless the context of use in this Permit clearly indicates otherwise. Where terms are not otherwise defined, the meaning otherwise associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

"Administrative Authority" means the Secretary of the Department of Environmental Quality or his designee or the appropriate assistant secretary or his designee.

"Application" refers to the RCRA Part B Permit Application and subsequent amendments submitted by the Permittee for obtaining a Permit.

"Area of Concern" (AOC) means any discernable unit or area, which, in the opinion of the Administrative Authority, may have received solid or hazardous waste or waste containing hazardous constituents at any time. The Administrative Authority may require investigation of the unit to determine if it is a Solid Waste Management Unit (SWMU). If shown to be a SWMU by the investigation, the AOC must be reported by the Permittee as a newly identified SWMU. If the AOC is shown not to be a SWMU by the investigation, the Administrative Authority may determine that no further action is necessary and notify the Permittee in writing.

"Area of Investigation" (AOI) is a zone contiguous to and including impacted media defined vertically and horizontally by the presence of one or more constituents in concentrations exceeding the limiting SS, MO-1 RS, or MO-2 RS (depending on the option being implemented).

"Beneficial Resource" describes a natural resource that is useful to human and ecological receptors. The state may establish statutes or regulations that identify certain environmental components, such as specific ground water or surface water sources, as a "Special Beneficial Resource," or "Designated Beneficial Resource." The beneficial resource then may be entitled to greater protection from contamination.

"Constituents of Concern" (COC) means the COPCs that pose a significant risk.

"Constituents of Potential Concern" (COPC) means chemicals from hazardous waste and hazardous waste constituents that are potentially site related and have data of quality for use in the Screen or a site-specific risk assessment. The facility should compile a list of COPCs for each release site based on existing sampling data, waste analysis reports, etc.

"Conceptual Site Model" (CSM) is part of the Data Quality Objective (DQO) process that presents a three-dimensional picture of site conditions at a discrete point in time that conveys what is known about the facility, releases, release mechanisms, contaminant fate and transport,

exposure pathways, potential receptors, and risks. The information for the CSM is documented into six profiles. The CSM evolves as data gaps in the profiles become more complete, and will be refined based upon results of site characterization data. The final CSM is documented in the Risk Management Plan (RMP).

"CWA" means Clean Water Act.

"Corrective Action" is an activity conducted to protect human health and the environment.

"Department" means the Louisiana Department of Environmental Quality.

"Dense Nonaqueous Phase Liquid (DNAPL)" a dense liquid not dissolved in water, commonly referred to as "free product."

"EPA" means the United States Environmental Protection Agency.

"ESP" means electrostatic precipitator.

"Facility" means, for the purpose of conducting corrective action under LAC 33:V.3322, all the contiguous property under the control of the Permittee.

"HSWA" means the 1984 Hazardous and Solid Waste Amendments to RCRA.

"Hazardous Constituent" means any constituent identified in LAC 33:V.Chapter 31, Table 1, or any constituent identified in LAC 33:V.3325, Table 4.

"LDEQ" means the Louisiana Department of Environmental Quality.

"Light Nonaqueous Phase Liquid (LNAPL)" a light liquid not dissolved in water, commonly referred to as "free product."

"Newly-discovered Release" any release(s) of hazardous waste, including hazardous constituents, in which there is a statistically significant in crease over the background data for the media of concern, during the course of groundwater monitoring, field investigation, environmental auditing, or by other means.

"Operating Record" means written or electronic records of all maintenance, monitoring, inspection, calibration, or performance testing—or other data as may be required—to demonstrate compliance with this Permit, document noncompliance with this Permit, or document actions taken to remedy noncompliance with this Permit. The minimum list of documents that must be included in the operating record is identified at LAC 33:V.1529.B.

"Permittee" means Rhodia Inc., 1275 Airline Highway, Baton Rouge, Louisiana 70805.

"RCRA Permit" means the full permit, with RCRA and HSWA portions.

"RFA" means RCRA Facility Assessment.

"RFI" means RCRA Facility Investigation.

"Release" means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

"SARA" means Superfund Amendments and Reauthorization Action of 1986.

"SARU" means sulfuric acid regeneration unit.

"Solid Waste Management Unit" (SWMU) means any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

"Stabilization" is an action taken for the purpose of controlling or abating threats to human health or the environment from releases or preventing or minimizing the further spread of contaminants while long-term remedies are pursued.

If, subsequent to the issuance of this Permit, regulations are promulgated which redefine any of the above terms, the Administrative Authority may, at its discretion, apply the new definition to this Permit.

All regulating citations are defined as being the regulations in effect on the date of issuance of this permit. New and/or amended regulations are not included as Permit requirements until permit modification procedures as specified in Condition II.C of the permit and LAC 33:V.321 are completed.

II. GENERAL PERMIT CONDITIONS

II.A. DURATION OF PERMIT

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a maximum period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

II.B. EFFECT OF PERMIT

This permit authorizes the Permittee to store and treat hazardous waste, including waste received from off-site sources, in accordance with the conditions of this permit. The Permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this permit. Compliance with this permit, LAC 33:V.Subpart 1 and HSWA, constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA and Chapter 9 of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Condition 3013 or Condition 7003 of RCRA, or under Condition 106 (a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) {42 U.S.C. 9606 (a)}.

In accordance with LAC 33:V.307.B and C, issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations.

II.C. PERMIT ACTIONS

Any inaccuracies found in the permit application may be cause for revocation or modification of this permit. The Permittee must inform the Administrative Authority of any deviation from, changes or inaccuracies in the information in the permit application.

The Administrative Authority may also suspend, modify, revoke and reissue, or terminate for cause when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or LAC 33:V.309.F, 311.A or 323. The Administrative Authority may modify the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of Permittee does not stay the applicability or enforceability of any permit condition.

II.D. SEVERABILITY

The conditions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

II.E. DUTIES AND REQUIREMENTS

II.E.1. Duty to Comply

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit, as described in LAC 33:V.701. Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of the LAC 33:V.Subpart 1 and the Environmental Quality Act and is grounds for enforcement action which may include permit termination, permit revocation and reissuance, permit modification, or denial of permit renewal application.

II.E.2. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must reapply for the permit as required by the LAC 33:V.303.N and 309.B. Notification shall be at least 180 calendar days before the permit expires.

II.E.3. Permit Extension

This permit and all conditions herein will remain in effect beyond the permit's expiration date until the Administrative Authority issues a final decision on the re-application, provided the Permittee has submitted a timely, complete new permit application as provided in LAC 33:V.309.B and 315.A.

II.E.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

II.E.5. Duty to Mitigate

The Permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit as required by LAC 33:V.309.D.

II.E.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related ancillary equipment) that are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator

staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

II.E.7. Duty to Provide Information

The Permittee shall furnish to the Administrative Authority, within a reasonable time, any information which the Administrative Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Administrative Authority upon request, copies of records required by this permit and in accordance with LAC 33:V.309.H.

II.E.8. Inspection and Entry

The Permittee shall allow the Administrative Authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

II.E.8.a. enter upon the Permittee's premises where a regulated activity is located or conducted, or where records must be maintained under the conditions of this permit;

II.E.8.b. have access to and copy, at reasonable times, any records that must be maintained under the conditions of this permit;

II.E.8.c. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operation regulated or required under this permit; and

II.E.8.d. sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Administrative Authority any substances or parameters at any location.

II.E.9. Sample Monitoring and Records

II.E.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, "SW-846", latest revision; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method as specified in the attached Waste Analysis Plan referenced in Attachment 1.

II.E.9.b. Records of monitoring information shall include:

II.E.9.b.(1). the date, exact place, and time of sampling or measurements;

II.E.9.b.(2). the name(s) and signature(s) of the individual(s) who performed the sampling or measurements:

II.E.9.b.(3). the date(s) analyses were performed;

II.E.9.b.(4). the name(s) and signature(s) of the individual(s) who performed the analyses;

II.E.9.b.(5). the analytical techniques or methods used;

II.E.9.b.(6). the results of such analyses; and

II.E.9.b.(7). associated quality assurance performance data.

II.E.9.c. Laboratory Quality Assurance/Quality Control

In order to ensure the accuracy, precision, and reliability of data generated for use, the Permittee shall submit a statement, certified as specified in LAC 33:V.513 and included in the annual report, indicating that:

II.E.9.c.(1). any commercial laboratory providing analytical results and test data to the Department required by this permit is accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance with LAC 33:I. Subpart 3, Chapter 45. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted by the Department.

LAC 33:I.Subpart 3 (Chapters 45-49) provides requirements for the accreditation program. Regulations and a list of labs that have applied for accreditation are available on the LDEQ website located at: http://www.deq.louisiana.gov/portal/tabid/2412/Default.aspx.

In accordance with LAC 33:V.4501, the requirements for LELAP accreditation applies whenever data is:

- submitted on behalf of a facility;
- required as part of a permit application;
- required by order of the Department;
- required to be included in a monitoring report submitted to the Department;
- required to be submitted by contract; or

- otherwise required by Department regulations.

This includes, but is not limited to, data from RCRA Trial Burns, Risks Burns, Risk Assessments, MACT Comprehensive Performance Tests, and data used for continuing compliance demonstrations.

II.E.9.c.(2). If the Permittee decides to use its own in-house laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document all quality assurance/quality control procedures used to generate data for the LDEQ.

II.E.9.c.(3). For approval of equivalent testing or analytical methods, the Permittee may petition for a regulatory amendment under LAC 33:V.105.I and LAC 33:I.Chapter 9. In cases where an approved methodology for a parameter/analyte is not available or listed, a request to utilize an alternate method shall be submitted to the Administrative Authority for approval. Documentation must be submitted to the LDEQ that will verify that the results obtained from the alternate method are equal to or better than those obtained from EPA-accepted methods, as well as those deemed equivalent by the LDEQ.

II.E.10. Retention of Records

The Permittee shall maintain records through the active life of the facility (including operation, closure and post-closure periods) as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C. All records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C. File copies shall be kept for LDEQ Inspection for a period of not less than three years as required by LAC 33:V.317.B.

The Permittee shall, for the life of the permit, maintain records of all data used to complete the application for this permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (LA. R.S. 30:2171 et seq.).

II.E.11. Notices of Planned Physical Facility Changes

The Permittee shall give notice to the Administrative Authority, as soon as possible, of any planned physical alterations or additions to the permitted facility, in accordance with LAC 33:V.309.L.1.

II.E.12. Physical Facility after Modification

For any new or existing unit being modified, the Permittee may not manage hazardous waste in the modified portion of the unit until the unit is complete and:

II.E.12.a. the Permittee has submitted to and received approval from the Administrative Authority, by certified mail or hand delivery, a letter signed by the Permittee and an independent registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the permit; and

II.E.12.b. the Administrative Authority has inspected the modified unit following a request to make final inspection by the Permittee and finds it is in compliance with the conditions of the permit and all applicable sections of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The Permittee may then commence treatment, storage, or disposal of hazardous waste.

II.E.13. Anticipated Noncompliance

The Permittee shall give advance notice to the Administrative Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

II.E.14. Transfer of Permits

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to LAC 33:V.309.L.4, 321.B, 321.C.4, and 1531.D and E, as applicable.

II.E.15. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date as required by LAC 33:V.309.L.6.

II.E.16. Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3915, in the event of an unauthorized discharge that results in an emergency condition (an emergency condition is any condition which could be reasonably expected to endanger the health and safety of the public, cause significant adverse impact to the land, water, or air environment, or cause severe damage to property), the Permittee shall notify the DPS (Department of Public Safety) 24-hour Louisiana Emergency Hazardous Materials Hotline by telephone at (225) 925-6595 or 1-877 925-6595 immediately, but in no case later than one (1) hour after learning of the discharge. The DPS 24-hour Louisiana Emergency Hazardous Materials Hotline will subsequently notify the Department regarding the details of the discharge.

II.E.17. Non-Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3917, in the event of an unauthorized discharge that exceeds a reportable quantity specified in LAC 33:I.Chapter 39.Subchapter E and/or results in contamination of the groundwaters of the state but does not result in an emergency condition, the Permittee shall promptly notify the Department within twenty-four (24) hours after learning of the discharge. Notification shall be made to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC) in accordance with the procedure and content requirements specified in LAC 33:I.3923.

II.E.18. Unauthorized Discharge to Groundwater Notification

In accordance with LAC 33:I.3919, in the event of an unauthorized discharge resulting in contamination of groundwaters of the state by moving in, into, within or on any saturated subsurface strata, the Permittee shall notify the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC within seven days after learning of the discharge.

II.E.19. Written Notification Reports for Unauthorized Discharges

The Permittee shall submit written reports to the SPOC for any unauthorized discharges requiring notification under Conditions II.E.16, II.E.17 and II.E.18 of this permit, to the SPOC within seven (7) calendar days after notification required by Conditions II.16 through II.18, in accordance with LAC 33:I.3925.

II.E.20. Noncompliance Reporting

The Permittee shall report orally within twenty-four (24) hours any noncompliance with the permit not reported under Condition II.E.16, II.E.17, and II.E.18 that may endanger the human health or the environment. This report shall include at minimum the following information:

II.E.20.a. information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

II.E.20.b. information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

II.E.20.b.(1). name, address, and telephone number of the owner or operator;

II.E.20.b.(2). name, address, and telephone number of the facility;

II.E.20.b.(3). date, time, and type of incident;

II.E.20.b.(4). name and quantity of materials involved;

II.E.20.b.(5). the extent of injuries, if any;

II.E.20.b.(6). an assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

II.E.20.b.(7). estimated quantity and disposition of recovered material that resulted from the incident.

II.E.21. Follow-up Written Report of Noncompliance

The Permittee shall provide a written submission within five (5) days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment and reported under Condition II.E.20. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the Permittee submits a written report within fifteen (15) days after the time the Permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.d.

II.E.22. Other Noncompliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time required monitoring reports are submitted. The reports shall contain the information listed in Condition II.E.20.

II.E.23. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the Administrative Authority, the Permittee shall promptly submit such facts or information.

II.E.24. Signatory Requirement

All applications, reports or other information submitted to the Administrative Authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

II.E.25. Schedule of Compliance

II.E.25.a. The Permittee must submit to the Office of Environmental Services, Waste Permits Division, a test burn plan to demonstrate that Units 1 and 2 remain in compliance with the conditions of this permit after alterations are made as required by the Consent Decree, Settlement No. SA-AE-07-0015. The test burn plan must be submitted at least 120 days before the scheduled date of the trial burn.

II.E.25.b. The Administrative Authority has approved the proposed modifications to Unit 1 submitted by the Permittee in the permit application. The proposed modifications are detailed below and described in the permit application as referenced in Attachment 1 of this permit. The Permittee must submit to the Office of Environmental Services, Waste Permits Division, a test burn plan ninety (90) days before implementation of each proposed modification listed below. The Permittee may consolidate test burn plans in

II.E.25.b.(1). The Permittee has proposed to preheat combustion air by the addition of a heat exchanger. The Permittee must perform a DRE test for Unit 1 upon completion of the modification.

II.E.25.b.(2). The Permittee has proposed the addition of two new spent acid nozzles on the combustion furnace. The Permittee must perform a DRE test for Unit 1 upon completion of the modification.

II.E.25.b.(3). The Permittee has proposed the installation of an additional second stage electrostatic precipitator. The Permittee must perform a test confirming or optimizing the minimum voltage upon completion of the modification.

II.E.25.c. The Administrative Authority has approved the proposed modifications to Unit 2 submitted by the Permittee in the permit application. The proposed modifications are detailed below and described in the permit application as referenced in Attachment 1 of this permit.

II.E.25.c.(1). The Permittee has proposed to preheat combustion air by the addition of a heat exchanger. The Permittee must perform a DRE test for Unit 2 upon completion of the modification.

II.E.25.c.(2). The Permittee has proposed to replace the waste heat boiler with a new design. The Permittee must perform dioxin/furan testing for Unit 2 upon completion of the modification.

II.E.25.c.(3). The Permittee has proposed to replace the quench tower using different materials of construction and spray configuration. The

Permittee must perform chloride, metals and particulate testing upon completion of the modifications.

II.E.25.c.(4). The Permittee has proposed to replace the wet brinks with a second stage electrostatic precipitator. The Permittee must perform testing for metals, particulate and voltage parameters upon completion of the modification.

II.E.25.c.(5). The Permittee has proposed the addition of four new spent acid nozzles on the combustion furnace. The Permittee must perform a DRE test for Unit 2 upon completion of the modification.

II.E.25.c.(6). The Permittee has proposed the addition of two new hazardous waste nozzles on the combustion furnace. The Permittee must perform a DRE test for Unit 2 upon completion of the modification.

II.E.25.c.(7). The Permittee has proposed the addition of two nozzles for steam injection on the furnace. The Permittee must perform a DRE test for Unit 2 upon completion of the modification.

II.E.25.d. Sixty (60) days after the effective date of the permit, the Permittee must submit a Risk Burn Plan to the Administrative Authority. The Permittee must run Method 429, Determination of Polycyclic Aromatic Hydrocarbon Emissions from Stationary Sources to refine detection limits for PAHs (see http://www.arb.ca.gov/testmeth/vol3/M_429.pdf for a description of the method). In addition, the Permittee must confirm the minimum voltage condition of this permit and run the risk burn under normal conditions without spiking of metals.

II.E.25.e. Special Operational Status of the Electrostatic Precipitators

Operations of parallel ESPs are defined by the most inefficient ESP. One of the parallel ESPs, on either Unit 1 or 2, may be shutdown provided the following:

II.E.25.e.(1). The maximum volumetric flow rate cannot exceed one half of the allowable reported value in Tables 7 and 10,

II.E.25.e.(2). The minimum voltage on the operational ESP must be maintained as specified in Tables 7 and 10,

II.E.25.e.(3). The minimum voltage for the inoperational ESP will be allowed to set to zero voltage,

II.E.25.e.(4). These new operational parameters shall be effective as AWFCO.

II.E.25.e.(5). The volumetric flow through the nonoperational ESP should be zero with the unit isolated.

II.E.25.f. Since Condition II.E.25.e is an alternative mode of operation, the condition must be demonstrated in a trial burn. The Permittee must submit to the Administrative Authority test burn plan addressing the operations of Units 1 and 2 with an nonoperational ESP. The Permittee must meet a standard of 0.08 grains/dscf (dry standard cubic feet). The test must be integrated with the test burn plan required in Condition II.E.25.d.

II.E.25.g. Any increase in the production capacity of Unit 1 or 2 requiring an increase in waste feed will require a test burn to demonstrate compliance with the conditions of this permit.

II.E.25.h. Any test burn plan required by this permit must contain a schedule of implementation culminating in a test burn report submitted in accordance with the approved test burn plan. Ninety (90) days after completion of any test burn required by this permit, the Permittee must submit a test burn report to the Administrative Authority. Deviation from the schedule must receive concurrence from the administrative authority. The Permittee must receive an approval of the resulting test burn report from the Administrative Authority. The Administrative Authority will notify the Permittee of the results of the review of the test burn report in writing.

II.E.26. Additional Operating Standards

(RESERVED)

II.E.27. Updated Documents To Be Submitted Prior To Operation

(RESERVED)

II.E.28. Documents To Be Maintained at Facility Site

II.E.28.a. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and any amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report unless previously submitted.

II.E.28.a.(1). Waste Analysis Plan submitted in accordance with LAC 33:V.1519 and approved by the Administrative Authority (see Attachment 1).

II.E.28.a.(2). Personnel Training Plan and the training records as required by LAC 33:V.1515 (see Attachment 1).

II.E.28.a.(3). Contingency Plan submitted in accordance with LAC 33:V.1513 and approved by the Administrative Authority (see Attachment 1).

II.E.28.a.(4). Arrangements with local authorities in accordance with LAC 33:V.1511.G (see Attachment 1).

II.E.28.a.(5). Closure Plans submitted in accordance with LAC 33:V.3511 and approved by the Administrative Authority, as well as any post-closure care requirements that may be required initially or through permit modifications in accordance with LAC 33:V.3523 (see Attachment 1).

II.E.28.a.(6). Cost estimate for facility closure care submitted in accordance with LAC 33:V.3705 and approved by the Administrative Authority, as well as any post-closure cost estimate that may be required initially or through permit modifications in accordance with LAC 33:V.3709 (see Attachment 1).

II.E.28.a.(7). Operating records and Operations Plans referenced as required by LAC 33:V.1529, 1911.D, and 3007.K (see Attachment 1).

II.E.28.a.(8). Inspection Plan developed in accordance with LAC 33:V.517.G and 1509.B and approved by the Administrative Authority (see Attachment 1).

II.E.28.a.(9). Security Plan developed in accordance with LAC 33:V.1507 (see Attachment 1).

II.E.28.b. All proposed amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Administrative Authority for approval.

II.E.29. Annual Report

The Permittee shall submit an annual report covering all hazardous waste units and activities during the previous calendar year as required by LAC 33:V.1529.D.

II.E.30. Manifest

The Permittee shall report manifest discrepancies and un-manifested waste as required by LAC 33:V.309.L.8 and 9 and LAC 33:V.1107.

II.E.31. Emissions

Emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

II.E.32. Water Discharges

Water discharges from any hazardous waste facility shall not violate the Louisiana Water Quality Regulations. If water standards are exceeded, the site will follow water quality regulation protocol.

II.E.33. Non-Listed Hazardous Waste Facilities

This permit is issued for those hazardous waste facilities listed in Condition IV (Permitted Facilities). If the Permittee determines that an un-permitted hazardous waste facility exists, the Permittee must immediately notify the Administrative Authority in accordance with Condition II.E.22 of the General Permit Conditions.

II.E.34. Compliance With Land Disposal Restrictions

The Permittee shall comply with those land disposal restrictions set forth in LA. R.S. 30:2193, all regulations promulgated thereunder, and the HSWA portion of this permit (Conditions VII and VIII).

II.E.35. Establishing Permit Conditions

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303.

II.E.36. Obligation for Corrective Action

Owners or operators of hazardous waste management units must have all necessary permits during the active life of the unit and for any period necessary to comply with the corrective action requirements in Condition VIII. The facility is obligated to complete facility-wide corrective action for any newly discovered releases regardless of the operational status of the facility.

II.E.37. Attachments and Documents Incorporated by Reference

All attachments and documents required by this permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this permit by reference and become an enforceable part of this permit. When applicable, the Permittee must modify the permit according to LAC 33:V.Chapter 3. Since required items are essential elements of this permit, failure to submit any of the required items or

submission of inadequate or insufficient information may subject the Permittee to enforcement action, which may include fines, suspension, or revocation of the permit. Also, where applicable, the Permittee must meet all the permit modification requirements contained in LAC 33:V.321, 322, and 323.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this permit according to procedures in LAC 33:V.321.

III. GENERAL FACILITY CONDITIONS

III.A. DESIGN AND OPERATION OF ALL FACILITIES

III.A.1. The Permittee must maintain and operate all facilities to minimize the possibility of a fire, explosion, or any unauthorized sudden or non-sudden release of hazardous waste constituents to air, soil, or water that could threaten human health or the environment.

III.A.2. The Permittee shall not receive for treatment, storage, or disposal any hazardous waste generated outside the United States or its territories, in accordance with LA. R.S. 30:2189 of the Louisiana Environmental Quality Act.

III.B. REQUIRED NOTICE

(RESERVED)

III.C. GENERAL WASTE ANALYSIS

The Permittee shall follow the procedures described in the Waste Analysis Plan referenced in Attachment 1 and in accordance with LAC 33:V.1519.

III.C.1. The Permittee shall review the Waste Analysis Plan annually and report to the Administrative Authority in the annual report whether any revision is required to stay abreast of changes in EPA methods and/or State regulatory provisions.

III.C.2. Annually, the Permittee shall submit a certified statement that indicates that any laboratory (i.e., on-site laboratory or contract laboratory) that provides chemical analyses, analytical results, or other test data to the department, by contract or by agreement, is accredited in accordance with the laboratory accreditation requirements of LAC 33:I.Chapter 45. This written statement shall be certified as specified in LAC 33:V.513 and included in the annual report. This documentation shall be resubmitted when a different laboratory is contracted for services.

III.C.3. If there is reason to believe that the hazardous waste has changed or the operation generating the hazardous waste has changed, the Permittee shall review and re-characterize all potentially impacted hazardous waste streams generated by the Permittee on-site and treated, stored, and/or disposed on-site. The Permittee must re-characterize wastes in accordance with LAC 33:V.1519.A.3. This re-characterization shall include laboratory analyses which provide information needed to properly treat, store, and dispose of the hazardous waste, including physical characteristics and chemical components of the waste. The results of this re-characterization shall be summarized in the Permittee's Annual Report.

III.C.4. In accordance with LAC 33:V.1519.B, the Waste Analysis Plan must meet all sampling and QA/QC protocols contained in Condition II.E.9.c. All test procedures used

by the Permittee shall be maintained on file by the Permittee and made available to the LDEQ upon request.

III.D. SECURITY

The Permittee must comply with the security provisions of LAC 33:V.1507, as referenced in Attachment 1.

III.E. GENERAL INSPECTION REQUIREMENTS

The Permittee must follow the approved Inspection Plan referenced in Attachment 1. The Permittee must remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections must be kept as required by LAC 33:V.1509.D. The inspection schedule must include the regulatory requirements of LAC 33:V.517.G, 1509, 1911, 2109 and 3007.J.

III.F. PERSONNEL TRAINING

The Permittee must conduct personnel training as required by LAC 33:V.1515.A, B, and C. The Permittee shall follow the approved Personnel Training Plan referenced in Attachment 1. The Permittee shall maintain all training documents and records as required by LAC 33:V.1515.D and E.

III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee must take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable or reactive wastes. The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517, 1917, 1919, 2113 and 2115.

III.H. LOCATION STANDARDS

III.H.1. The Permittee has furnished that it is in compliance with seismic standards as required by LAC 33:V.517.T.

III.H.2. The Permittee must not manage any hazardous waste on any portion of the property that lies within the 100 year flood plain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements must be certified by independent licensed professional engineers and approved by the Administrative Authority prior to any hazardous waste and/or hazardous waste units being placed thereon.

III.I. PRECIPITATION RUN-ON AND RUN-OFF

The Permittee must provide for the control by diversion and/or containment of run-on and run-off resulting from a rainfall occurring during a period of twenty-four (24) hours as defined by local rainfall records and LAC 33:V.1503.B.2. The Permittee shall comply with the requirements of LAC 33:V.1907.E.1.b.

III.J. HURRICANE EVENTS

The Permittee must initiate those applicable portions of the Contingency Plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509 and 1511.

III.K. PREPAREDNESS AND PREVENTION

III.K.1. Required Equipment

At a minimum, the Permittee must install and maintain the equipment set forth in the Contingency Plan, as required by LAC 33:V.1511.C.

III.K.2. Testing and Maintenance of Equipment

The Permittee must test and maintain the equipment specified in Condition III.K.1 to insure its proper operation in time of emergency. The testing and maintenance of the equipment must be documented in the operating record.

III.K.3. Access to Communications or Alarm Systems

The Permittee must maintain access to the communications or alarm system as required by LAC 33:V.1511.E.1 and 1511.E.2.

III.K.4. Required Aisle Space

In no case shall aisle space be less than two (2) feet. In addition, the Permittee shall maintain adequate aisle space as required by LAC 33:V.1511.F.

III.K.5. Arrangements with Local Authorities

The Permittee shall document in the annual report that the requirements of LAC 33:V.1511.G have been met. This documentation shall include those state and local agencies involved and those facilities and operations covered. Documentation of written arrangements with state and local agencies shall also be included in this report. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

III.L. CONTINGENCY PLAN

III.L.1. Implementation of Plan

The Permittee must immediately carry out the provisions of the approved Contingency Plan referenced in Attachment 1, and follow the emergency procedures described by LAC 33:V.1513.F whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

III.L.2. Copies of Plan

The Permittee must comply with the requirements of LAC 33:V.1513.C.

III.L.3. Amendments to Plan

The Permittee must review and immediately amend, if necessary, the Contingency Plan as required by LAC 33:V.1513.D.

III.L.4. Emergency Coordinator

The Permittee must comply with the requirements of LAC 33:V.1513.E concerning the emergency coordinator.

III.M. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of LAC 33:V.Chapter 11.

III.N. RECORD KEEPING AND REPORTING

III.N.1. Operating Record

The Permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.A, B, and C and the approved Operations Plan referenced in Attachment 1.

III.N.2. Annual Report

The Permittee must comply with the annual report requirements of LAC 33:V.1529.D.

III.N.3. Operations Manual

The Permittee shall compile and keep current an operations manual covering all aspects of the Permittee's storage facilities.

III.O. CLOSURE/POST-CLOSURE

The Permittee shall address the following regulatory citations in the closure plan: LAC 33:V.1915, 3503, 3505, 3507, 3509, 3511, 3513, and 3515. The Administrative Authority may re-evaluate the adequacy of the approved closure plan and/or the confirmatory sampling procedures prior to the commencement of closure (e.g., permit renewal applications, permit modifications, notifications of intent to close).

III.O.1. Closure Performance Standard

The Permittee shall close the facility in accordance with the approved Closure Plan referenced in Attachment 1 and in accordance with the applicable sections of LAC 33:V.3507.

III.O.2. Amendment to Closure Plan

The Permittee shall amend the Closure Plan where necessary, in accordance with LAC 33:V.3511.C. Any modification shall be subject to LAC 33:V.321, 322 and 323, where applicable

III.O.3. Notification of Closure

The Permittee shall notify the Administrative Authority at least forty-five (45) days prior to the date it expects to begin closure in accordance with LAC 33:V.3511.D.

III.O.4. Time Allowed For Closure

After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan referenced in Attachment 1 and in accordance with LAC 33:V.3513.

III.O.5. Disposal or Decontamination of Equipment

The Permittee shall decontaminate and dispose all facility equipment in accordance with the approved Closure Plan referenced in Attachment 1 and in accordance with LAC 33:V.3515.

III.O.6. Certification of Closure

The Permittee shall certify that the facility has been closed in accordance with the specifications in the approved Closure Plan as required by LAC 33:V.3517.

III.O.7. Inventory at Closure

The Permittee shall be responsible for closure cost based upon the maximum permitted facility inventories listed below in Tables 1 and 2.

III.P. POST-CLOSURE

The Permittee must attempt to clean close all hazardous waste units. If the facility cannot be clean closed, the Permittee shall submit a post-closure plan for approval by the Administrative Authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519-3527, including maintenance and monitoring throughout the post-closure care period.

III.Q. COST ESTIMATE FOR CLOSURE/POST-CLOSURE

III.Q.1. The Permittee must maintain cost estimates for closure of facilities in accordance with LAC 33:V.3705 and 3707.

III.Q.2. The Permittee shall maintain and adjust the closure cost estimate for inflation, as specified in LAC 33:3705.B, 3705.C, and for other circumstances that increase the cost of closure.

III.Q.3. The Permittee must adjust the closure cost estimate within thirty (30) days after approval by the Administrative Authority of any request to modify the closure plan in accordance with LAC 33:V.3705.C. The Permittee shall consider the impact of any inventory and/or process changes on the closure cost estimate.

III.Q.4. The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure most expensive and must be based on costs to the Permittee of hiring a third party to execute all closure activities. The closure cost estimate shall be based on the maximum permitted inventory of each facility as specified in Condition IV, Tables 1 and 2.

III.Q.5. If the Permittee is unable to complete clean closure of all facilities referenced in Condition IV, Tables 1 and 2 as per LAC 33:V.Chapter 35 and as acceptable by the Administrative Authority, a Post-Closure Plan must be submitted for each facility failing to achieve clean closure within ninety (90) days from the date that the Permittee or Administrative Authority determines that the unit must be closed as a landfill. The Post-Closure Plan must meet the requirements of LAC 33:V.3523.B.

III.R. FINANCIAL ASSURANCE FOR CLOSED UNITS

The Permittee shall establish and maintain financial assurance for closure in accordance with LAC 33:V.3707 for all units listed under Condition IV of this permit.

III.S. LIABILITY REQUIREMENTS

The Permittee shall have and maintain liability coverage for sudden accidental occurrences in the amounts of $1,000,000 each occurrence and $2,000,000 annual aggregate, exclusive of legal defense costs, as required by LAC 33:V.3715.A. The Permittee shall have and maintain liability coverage for non-sudden accidental occurrences in the amounts of $3,000,000 each occurrence and $6,000,000 annual aggregate, exclusive of legal defense costs, as specified in LAC 33:V.3715.B.

III.T. INCAPACITY OF THE PERMITTEE

The Permittee must comply with LAC 33:V.3717 whenever bankruptcy is initiated for the Permittee or its institutions providing financial assurance. If insurance is used for compliance with LAC 33:V.3715, the Permittee must immediately notify the Administrative Authority if the insurance company is placed in receivership. The Permittee must establish other financial assurance or liability coverage within sixty (60) days after such an event.

III.U. POST-CLOSURE NOTICES

(RESERVED)

IV. PERMITTED UNITS

The Permittee may not treat or store waste in any proposed unit described in Condition IV until the LDEQ has been notified by certified mail or hand delivered letter that the Permittee has completed construction of the unit(s) and built the unit(s) in accordance with this permit. In addition, the unit(s) must be inspected by and received an order to proceed from the LDEQ in accordance with LAC 33:V.303.I.

IV.A. TANKS

Details of the existing tanks listed in Table 1, including design and operational specifications are contained in Condition V.A. The details of the existing tanks listed in Table 1, including design and operational specifications, are contained in Condition V.A of this permit.

TABLE 1
(7) Existing Hazardous Waste Tanks

TANKS	SERVICE	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS)
40D200	Hot Waste Fuel Storage	Reference the Part A form of this permit for the waste codes accepted by the Permittee.	47,000
40C280	Cold Waste Fuel Storage		47,000
40C210	Hot Waste Fuel Storage		12,000
40C290	Cold Waste Fuel Storage		12,000
40C220	Hot Waste Fuel Storage		8,000
40C300	Cold Waste Fuel Storage		8,000
40D250	Cold Waste Fuel Storage		157,000
(4) Proposed Hazardous Waste Tanks			
40C310	Hot Waste Fuel Storage	Reference the Part A form of this permit for the waste codes accepted by the Permittee.	8,000
40C320	Hot Waste Fuel Storage		12,000
40C700	Hot Waste Fuel Storage		12,000
40C710	Hot Waste Fuel Storage		12,000

IV.B. CONTAINER STORAGE

The container storage areas listed in Table 2 below are permitted to store hazardous waste in properly labeled and sealed containers and roll-off boxes which have been specified for this purpose and are compatible with the contained waste. Any 55-gallon drums and roll-off boxes shall be stored in accordance with LAC 33:V.2109. The Permittee must manage hazardous waste in accordance with the approved waste analysis plan referenced in Attachment 1 of this permit.

TABLE 2
(4) Existing Container Storage Areas

CONTAINER STORAGE	LOCATION	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS)
Unit 1 Truck Direct Burn/Unloading	Acid Plant, SARU Unit 1	Reference the Part A form of this permit for the waste codes accepted by the Permittee.	7,000 Truck Tanker Trailer
Unit 2 Truck Direct Burn/Unloading	Acid Plant, SARU Unit 2		7,000 Truck Tanker Trailer
Treatment Services Truck Facility Unloading Area	Acid Plant		7,000 Truck Tanker Trailer
Railcar Unloading Area	Acid Plant		33,500 Railcar Unloading Area
(4) Proposed Container Storage Areas			
Railcar Direct Burn/Unloading Area	Acid Plant	Reference the Part A form of this permit for the waste codes accepted by the Permittee.	33,500 Railcar Tanker
Truck Direct Burn/Unloading Area	Acid Plant		7,000 Truck Tanker Trailer
Truck Storage & Sampling/Unloading Area	Acid Plant		7,000 Truck Tanker Trailer
Trailer Staging Area	Acid Plant		7,000 Truck Tanker Trailer

IV.C. COMBUSTION UNITS

Details of the existing combustion unit listed in Table 3, including design and operational specifications, are contained in Permit Conditions V.C through V.F. For purposes of this permit, the BIF (RCRA regulated) portion of the SARUs is defined as the point at which waste enters the furnace to the exit of the final ESP.

TABLE 3
(2) Existing Combustion Unit

COMBUSTION UNIT	SERVICE	LOCATION	MAXIMUM PRODUCTION CAPACITY (Short Tons per day)
SARU Unit 1	Liquid Hazardous Waste	ACID PLANT	900.0
SARU Unit 2	Liquid Hazardous Waste	ACID PLANT	1200.0
SARU Unit 2 (proposed capacity increase)	Liquid Hazardous Waste	ACID PLANT	1900.0 (proposed capacity-see condition II.E.25.h)

V. PERMIT CONDITIONS APPLICABLE TO PERMITTED FACILITIES

V.A. TANKS

V.A.1. Description of Tank Systems

V.A.1.a. Operation

V.A.1.a.(1). All permitted tanks and associated piping, pumps, instruments, containments, and vent controls shall be operated and maintained in accordance with LAC 33:V.Chapter 19 and the specification and design criteria provided in the Permit Application.

V.A.1.a.(2). The Permittee shall operate and maintain all permitted tanks and containment systems according to the specifications, design criteria, and design limits specified in Table 4.

V.A.1.a.(3). The design temperature and pressure for each tank listed in Table 4, shall not change unless a permit modification is requested by the Permittee and subsequently approved by the Administrative Authority.

V.A.1.b. Permitted Tanks

V.A.1.b.(1). The tanks listed in Table 4 are permitted for hazardous waste storage. These tanks have been certified by an independent, professional engineer licensed in the State of Louisiana and have sufficient structural integrity for the storage of hazardous waste.

V.A.1.b.(2). The tanks listed in Table 4 must be clearly marked with the words "Hazardous Waste" in accordance with LAC 33:V.1109.E.1.d.

V.A.1.b.(3). The Permittee is prohibited from storing or treating hazardous

waste in any tank storage system not listed in Table 4 for greater than ninety (90) days, unless an extension is granted by the Administrative Authority in accordance with LAC 33:V.1109.E.2.

V.A.1.b.(4). The Permittee is prohibited from receiving any hazardous waste from offsite.

V.A.1.c. Proposed Tanks

Prior to placing any proposed tank referenced in Table 4 of this permit into service, the Permittee must submit to the Administrative Authority a notification containing the expected date the tanks will be put into service and the nominal built thickness and minimum thickness. After review and approval of this notification, the Permittee must submit a class 1 modification updating Table 4 of this permit.

TABLE 4
DESIGN AND OPERATING PARAMETERS FOR RCRA TANK SYSTEMS

Tank No./Old Tank Number	Year Put Into Service	Service	Materials of Construction	Dimensions and Permitted Capacity	Design Standard	Inspection Standard	Design Temp. And Pressure	Nominal Built Thickness	Minimum Thickness	Secondary Containment Type and Capacity
40D200/920	1986	Hot Waste Fuel Storage Tank	Head: SA-285-C Shell: SA-285-Ctop SA-516-70 Bott.	I.D.=21'3" H=18' 47,000 Gal	API 620	API 653 & RPBR-QA-VT8	5 PSIG @ 200F	2nd ring: 7/16" 1st ring: 1/2" btm: 1/2" top: 7/16"	2nd ring: 0.188" 1st ring: 0.250" btm: 0.250" top: 0.188"	Concrete containment 8,260 cu.ft. (61,787 gal) Capacity
40C280/928	1986	Cold Waste Fuel Storage	Head: SA-285-C Shell: SA-285-Ctop SA-516-70 Bott.	I.D.=21'3" H=18' 47,000 Gal	API 620	API 653 & RPBR-QA-VT8	5 PSIG @ 200F	2nd ring: 7/16" 1st ring: 1/2" btm: 1/2" top: 7/16"	2nd ring: 0.188" 1st ring: 0.250" btm: 0.250" top: 0.188"	Concrete containment 8,260 cu.ft. (61,787 gal) Capacity
40C210/921	1986	Hot Waste Fuel Storage Tank	Head: SA-285-C Shell: SA-285-C	I.D.=12' 0" T/T=14' 12,000 Gal	ASME Sec. VIII Div. 1	API 510 & RPBR-QA-VT1	35 PSIG @ 650F	2nd ring:1/2" 1st ring: 3/4" btm: 5/8" top: 9/16"	2nd ring: 0.216" 1st ring: 0.216" Btm: 0.289" Top: 0.289"	Concrete containment 8,260 cu.ft. (61,787 gal) Capacity
40C290/929	1986	Cold Waste Fuel Storage	Head: SA-285-C Shell: SA-285-C	I.D.=12' 0" T/T=14' 12,000 Gal	ASME Sec. VIII Div. 1	API 510 & RPBR-QA-VT1	35 PSIG @ 650F	2nd ring:1/2" 1st ring: 3/4" btm: 5/8" top: 9/16"	2nd ring: 0.216" 1st ring: 0.216" Btm: 0.289" Top: 0.289"	Concrete containment 8,260 cu.ft. (61,787 gal) Capacity
40C220/922	1986	Hot Waste Fuel Storage Tank	Head: SA-285-C Shell: SA-285-C	I.D.=10' 0" T/T=14' 8,000 Gal	ASME Sec. VIII Div. 1	API 510 & RPBR-QA-VT1	35 PSIG @ 650F	2nd ring:1/2" 1st ring: 3/4" btm: 9/16" top: 9/16"	2nd ring: 0.180" 1st ring: 0.180" Btm: 0.252" Top: 0.252"	Concrete containment 8,260 cu.ft. (61,787 gal) Capacity
40C300/930	1986	Cold Waste Fuel Storage	Head: SA-285-C Shell: SA-285-C	I.D.=10' 0" T/T=14' 8,000 Gal	ASME Sec. VIII Div. 1	API 510 & RPBR-QA-VT1	35 PSIG @ 650F	2nd ring:1/2" 1st ring: 3/4" btm: 9/16" top: 9/16"	2nd ring: 0.180" 1st ring: 0.180" Btm: 0.252" Top: 0.252"	Concrete containment 8,260 cu.ft. (61,787 gal) Capacity

Tank No./Old Tank Number	Year Put Into Service	Service	Materials of Construction	Dimensions and Permitted Capacity	Design Standard	Inspection Standard	Design Temp. And Pressure	Nominal Built Thickness	Minimum Thickness	Secondary Containment Type and Capacity
40D250/950	1993	Cold Waste Fuel Storage	Bott., shell, & roof: SA-516-70	I.D.=29' 10" H=29.75' 157,000 Gal	API 620	API 653 & RPBR-QA-VT8	5 PSIG @ 200F	3rd ring: 1/2:" 2nd ring: 5/8" 1st ring: 3/4" Btm: 5/8" Top: 1/2"	3rd ring: 0.250" 2nd ring: 0.375" 1st ring: 0.500" Btm: 0.375" Top: 0.250"	Concrete containment 32,290 cu.ft (241, 533 gal) Capacity
40C310/None	Future new tank	Hot Waste Fuel Storage Tank	Carbon Steel per the design specification	I.D.=10' T/T=14' 8,000 gal	ASME Sec. VIII Div.1	API 510 & RPBR-QA-VT1	35 PSIG @ 650 F	To be designed	To be calculated	Concrete containment 32,290 cu.ft (241, 533 gal) Capacity
40C320/None	Future new tank	Hot Waste Fuel Storage Tank	Carbon Steel per the design specification	I.D.=12' T/T=14' 12,000 gal	ASME Sec. VIII Div.1	API 510 & RPBR-QA-VT1	35 PSIG @ 650 F	To be designed	To be calculated	Concrete containment 32,290 cu.ft (241, 533 gal) Capacity
40C700/None	Future new tank	Hot Waste Fuel Storage Tank	Carbon Steel per the design specification	I.D.=12' T/T=14' 12,000 gal	ASME Sec. VIII Div.1	API 510 & RPBR-QA-VT1	35 PSIG @ 650 F	To be designed	To be calculated	Concrete enclosure with 7,358 cu. Ft (55, 040 gal)
40C710/None	Future new tank	Hot Waste Fuel Storage Tank	Carbon Steel per the design specification	I.D.=12' T/T=14' 12,000 gal	ASME Sec. VIII Div.1	API 510 & RPBR-QA-VT1	35 PSIG @ 650 F	To be designed	To be calculated	Concrete enclosure with 7,358 cu. Ft (55, 040 gal)

V.A.2. Permitted and Prohibited Wastes

V.A.2.a. Permitted Waste

Subject to the terms of this permit, the Permittee is allowed to store in the tanks as described in Condition V.A.1.b, and the hazardous wastes identified in the most current RCRA Subtitle C Site Identification Form (Part A Permit Application).

V.A.2.b. Prohibited Waste

The Permittee is prohibited from storing hazardous waste that is not identified in the most current RCRA Subtitle C Site Identification Form (Part A Permit Application).

V.A.3. Secondary Containment

V.A.3.a. Duty to Comply with LAC 33:V.1907.B through F

The Permittee shall design, construct, operate, and maintain the secondary containment system in accordance with LAC 33:V.1907.B through F and Table 4 of this permit. Secondary containment must contain an impervious coating or material capable of preventing lateral or vertical migration of accumulated liquid and wastes.

V.A.3.b. Prevention of Migration

V.A.3.b.(1). Secondary containment systems must be maintained and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, groundwater, or surface water at any time during the use of the tank system in accordance with LAC 33:V.1907.B.1.

V.A.3.b.(2). Ancillary equipment must be provided with secondary containment, except as excluded by LAC 33:V.1907.F.

V.A.3.b.(3). Secondary containment systems must be free of cracks or gaps and other surface defects that would allow liquid to migrate out of the containment system in accordance with LAC 33:V.1907.E.

V.A.3.b.(4). Spilled or leaked waste and/or accumulated precipitation must be removed from the secondary containment system within twenty-four (24) hours in accordance with LAC 33:V.1907.C.4.

V.A.3.b.(5). If unable to remove spilled or leaked waste and/or accumulated precipitation within twenty-four (24) hours, the Permittee must demonstrate to the Administrative Authority that more time is required and propose an alternate schedule for removal.

V.A.3.c. Requirements for Facilities Requesting a Variance

(RESERVED)

V.A.4. OPERATING REQUIREMENTS

V.A.4.a. Duty to Comply with LAC 33:V.1909.A

The Permittee shall comply with LAC 33:V.1909.A. Hazardous wastes or treatment reagents must not be placed in a tank system if they could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode, or otherwise fail.

V.A.4.b. Duty to Comply with LAC 33:V.1909.B

The Permittee shall comply with LAC 33:V.1909.B and Table 4 of this permit. The Permittee must use appropriate controls and practices to prevent spills and overflows from tanks and containment systems.

V.A.4.c. Tank Covers

All hazardous waste storage tanks shall be covered and shall not be vented directly to the atmosphere if the tanks are used to store, or if a possibility exists that they may be used to store, volatile or malodorous waste.

V.A.4.d. Maintenance

The Permittee shall maintain the permitted tank systems according to the design code specified for each tank as listed in Table 4 and not exceed the listed operating conditions.

V.A.5. Ignitable, Reactive, and Incompatible Wastes

The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517.B, 1917 and 1919.

V.A.6. Inspections

V.A.6.a. Inspection Schedule

The Permittee shall comply with LAC 33:V.1911.A through C by following the inspection schedule submitted in the Inspection Plan (see Attachment 1).

V.A.6.b. Daily Inspection

V.A.6.b.(1). At least once per day while the tank is operating in hazardous waste service, the Permittee shall inspect the following:

V.A.6.b.(1).a. Aboveground portions of the tank system, including the tank, ancillary piping, valves, and vent controls, to detect corrosion, cracks or releases of waste.

V.A.6.b.(1).b. Data gathered from monitoring and leak detection equipment.

V.A.6.b.(1).c. The construction materials and area immediately surrounding the externally accessible portion of the tank system and ancillary equipment, e.g. secondary containment system, to detect erosion, cracks and signs of hazardous waste releases.

V.A.6.b.(2). All deficiencies noted during daily inspections must be recorded and remedied in a timely manner.

V.A.6.c. External Inspection

At a minimum, external inspection of each tank covered by this permit shall be performed as often as required by the API designated inspection standard in Table 4. The required frequency of inspection with reference to the applicable section of the standard shall be kept on site and available for review by the Administrative Authority upon request. The inspection shall be performed by a person meeting the minimum qualifications required under the inspection standard in Table 4. The inspection checklist shall be comparable to that in API Standard 510 or 653 as applicable.

If the result of such an inspection reveals that the tank is unfit for continued service, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.d. Internal Inspection

Internal inspection of each tank covered by this permit shall be performed as often as required by the inspection standard in Table 4. The required frequency of inspection with reference to the applicable section of the standard shall be kept on site and available for review by the Administrative Authority upon request. The inspection shall be performed by a person meeting the minimum qualifications required under the inspection standard in Table 4. The inspection checklist shall be comparable to that in API Standard 510 or 653 as applicable.

If the result of such an inspection reveals that the tank is unfit for continued service, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.e. Thickness Testing

V.A.6.e.(1). Thickness testing of each metallic tank covered by this permit shall be performed biennially.

V.A.6.e.(2). Tank thickness measurements shall be taken on the tank top, bottom, and shell and shall be taken at least on each tank quadrant. Tank thickness readings shall be taken in the same place during each testing event in order to form a comparison of readings for corrosion rate determination.

V.A.6.e.(3). Thickness testing of the tank bottom shall be performed as often as the internal inspection, or more often if required by the inspection standard specified in Table 4. The required frequency of inspection with reference to the applicable section of the inspection standard shall be kept onsite and made available to the Administrative Authority upon request.

V.A.6.e.(4). Tank thickness readings shall also be taken at any spot where visual corrosion or compromised integrity is evident.

V.A.6.e.(5). When any tank shell thickness measurement at a single point is less than that required in Table 4, the Permittee shall immediately comply with either Condition V.A.6.e.(5).a or b below. Condition V.A.6.e.(5).b shall not be used for any tank where the shell thickness measurement is less than 0.100 inches.

V.A.6.e.(5).a. When a tank is deemed unfit for use, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The tank shall be repaired or replaced and the certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.e.(5).b. An engineering evaluation shall be performed, conforming to the appropriate standard or standards, as allowed by the design or inspection standard in Table 4. If the evaluation determines that the tank is unfit for service, the Permittee shall comply with Condition V.A.6.e.(5).a immediately. The evaluation must be submitted to the Waste Permits Division for approval within forty-five (45) days of the initial measurement.

V.A.6.e.(6). Tank thickness measurements shall not be averaged, unless allowed under the tank inspection standard in Table 4. Averaging of tank thickness measurements shall be brought to the attention of the Administrative Authority.

V.A.6.f. Overfill Controls

Tank operators shall check and record tank gauges each operating day. Overfill controls shall be tested to ensure that they are in working order according to the schedule proposed in the Inspection Plan (see Attachment 1).

V.A.6.g. Fiberglass Tanks

(RESERVED)

V.A.7. Response to Leaks and Spills

V.A.7.a. Duty to Comply with LAC 33:V.1913.A through E

In the event of a leak or spill from a tank system, secondary containment system, or if a system becomes unfit for use, the Permittee shall comply with LAC 33:V.1913.A through E.

V.A.7.b. Leaks and Spills

V.A.7.b.(1). Upon discovering a leak or spill, the Permittee must immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

V.A.7.b.(2). Within twenty-four (24) hours of detecting a leak from the tank system, or in as timely a manner as is practical if the Permittee demonstrates that it is not possible to remove the waste within twenty-four (24) hours, the Permittee must remove as much waste as necessary to prevent further release from the tank or secondary containment system and to allow inspection and repair of the tank system in accordance with LAC 33:V.1913.B.1.

V.A.7.b.(3). Any spilled material or material trapped in sumps that is a hazardous waste or that will be disposed of as a hazardous waste must be cleaned up in a timely manner, as required by LAC 33:V.1505.C.3.

V.A.7.b.(3).a. If the collected material is discharged through a point source to United States waters or to a Publicly Owned Treatment Works, it is subject to the requirements of the Clean Water Act.

V.A.7.b.(3).b. If the collected material is released to the environment, it may be subject to reporting under applicable requirements of LAC 33:V.1505, LAC 33:I.Chapter 39, and 40 CFR Part 302.

V.A.7.b.(4). When a leak or spill occurs, the Permittee shall remove and properly dispose of any visible contamination of the soil or surface water in accordance with LAC 33:V.1913.C.2.

V.A.7.b.(5). A tank system from which a leak or spill has occurred must be closed in accordance with the approved Closure Plan and LAC 33:V.1915, unless the requirements of LAC 33:V.1913.E.2-3 are satisfied.

V.A.7.b.(5).a. For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service in accordance with LAC 33:V.1913.E.2.

V.A.7.b.(5).b. For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning the tank to service in accordance with LAC 33:V.1913.E.3.

V.A.7.b.(6). If the Permittee replaces a component of the tank system to eliminate a leak, that component must satisfy the requirements for new tank systems or components in LAC 33:V.1905 and 1907.

V.A.7.b.(7). All leaks and spills shall be documented in the daily inspection log.

V.A.7.c. Major Repairs

V.A.7.c.(1). The Permittee shall comply with LAC 33:V.1913.F when performing major repairs to a tank system.

V.A.7.c.(2). Major repairs shall include, but not be limited to, installation of an internal liner, repair of a ruptured tank, repair of a ruptured secondary containment area, and removal of a tank from its foundation for any reason.

V.A.7.c.(3). The Permittee shall conform to the appropriate portion of the most recent inspection code listed in Table 4 for maintenance, inspection, re-rating, repair, and alteration of all tanks.

V.A.7.c.(4). The tank shall not be returned to service unless the Permittee has obtained a certification by an independent professional engineer licensed in the State of Louisiana that the system is capable of handling hazardous waste without release for the intended life of the system. The certification of repairs shall include an inspection in accordance with the requirements of any applicable codes, such as API 510 or API 653. The certification shall be submitted to the Administrative Authority within seven (7) days of returning the tank system to use in accordance with LAC 33:V.1913.F.

V.A.8. Air Emission Control Equipment Standards

(RESERVED)

Note: In order to prevent redundant regulation, this condition and Condition VII.B (AA-BB Air Regulations) have been reserved. The Permittee will comply with the air emission control equipment standards of LAC 33:V. Chapter 17 by complying with the provisions of its Comprehensive Fugitive Emissions Monitoring Program implemented under the facility air permit. Failure by the Permittee to comply with those provisions that are equivalent to the provisions in LAC 33:V.Chapter 17 will also result in a failure to comply with LAC 33:V.Chapter 17.

V.A.9. Recordkeeping

V.A.9.a. New Tanks

In the event any new tank systems are installed, the Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of new tank systems, in accordance with LAC 33:V.1905.G.

V.A.9.b. Written Assessment

The Permittee shall keep on file at the facility, written assessments of the tank systems' integrity. The assessments shall be updated at the time of submittal of a Permit Renewal Application and/or at any other time deemed necessary by the Administrative Authority (i.e., permit modifications, tank replacements, tank repairs, etc.).

V.A.9.c. Inspections

V.A.9.c.(1). The Permittee shall document in the operating record for the facility inspection of those items in Condition V.A.6.a and b.

V.A.9.c.(1).a. The daily log sheets shall include all monitored parameters for the prevention of spills and overflows, including

temperature, pressures, and levels.

V.A.9.c.(1).b. The Permittee shall note all deficiencies discovered during the inspection in the inspection log.

V.A.9.c.(1).c. Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

V.A.9.c.(2). The Permittee shall document in the operating record all tests and inspections of overfilling controls.

V.A.9.c.(3). The Permittee shall keep on file at the facility the results of the internal and external inspections required by Condition V.A.6.c and d. The Permittee shall note all deficiencies discovered during the inspection in the inspection log. Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

V.A.9.c.(4). The Permittee shall keep on file at the facility all information related to tank thickness testing required under Condition V.A.6.e.

V.A.9.c.(4).a. This information shall include at a minimum the date(s) of assessment, the location where measurement readings are taken, the raw measurement data, comparison of actual reading to minimum thickness requirements, the corrosion rate, and calculation of remaining tank life.

V.A.9.c.(4).b. If an engineering evaluation is performed in accordance with Condition V.A.6.e.(5).b, the results of such an evaluation shall be kept in the operating record. The engineering evaluation must include, at minimum, details on how the evaluation was performed, references to applicable tank codes, raw data, calculations performed, and an explanation of why the tank is or is not fit for continued service.

V.A.9.c.(4).c. Any tank thickness measurements that are averaged under Condition V.A.6.e.(6) must be supported by documentation with references to the applicable tank codes. The documentation shall include all raw measurement data, calculations, and results of averaging. This information shall be kept as a part of the operating record for the facility.

V.A.9.c.(5). The Permittee shall keep on file at the facility the records of repairs required under Condition V.A.7.c.

V.A.9.d. Releases

V.A.9.d.(1). The Permittee shall keep on file at the facility notification reports submitted under LAC 33:V.1913.D.

V.A.9.d.(2). Within twenty-four (24) hours of detecting a reportable leak or spill from a tank system or secondary containment system to the environment, the Permittee shall report the leak in accordance with either Condition II.E.16 (Emergency Unauthorized Discharge) or Condition II.E.17 (Non-Emergency Unauthorized Discharge).

V.A.9.d.(3). As required by LAC 33:V.1913.D.3, within thirty (30) days of detecting a reportable release to the environment from a tank system or secondary containment system, the Permittee shall report the following information to the Administrative Authority's Single Point of Contact (SPOC):

V.A.9.d.(3).a. Likely route of migration of the release,

V.A.9.d.(3).b. Characteristics of the surrounding soil, including soil composition, geology, hydrogeology, and climate,

V.A.9.d.(3).c. Results of any monitoring or sampling conducted in connection with the release (if available). If the Permittee finds it will be impossible to meet this time schedule, the Permittee must provide the Administrative Authority with a schedule of when the results will be available. This schedule must be provided before the required thirty (30) day submittal period expires,

V.A.9.d.(3).d. Proximity of downgradient drinking water, surface water, and populated areas, and

V.A.9.d.(3).e. A description of response actions taken or planned.

V.A.9.e. Repairs

The Permittee shall keep on file at the facility all certifications required by Condition V.A.7.c.

V.A.10. Closure and Post-Closure Care

V.A.10.a. Duty to Comply with LAC 33:V.1915.A

The Permittee shall comply with LAC 33:V.1915.A by following the procedures specified in the approved Closure Plan, see Attachment 1.

V.A.10.b. Duty to Comply with LAC 33:V.1915.B

If the Permittee demonstrates that not all contaminated soils can be practicably removed or decontaminated in accordance with Condition V.A.10.a, the Permittee shall comply with LAC 33:V.1915.B.

V.A.10.c. Post-Closure

The Permittee shall attempt to clean close all tank systems. If the surface and subsurface soils below and adjacent to the tank system cannot be clean closed and the Permittee has not demonstrated through a risk assessment approved by the Administrative Authority that closure with the remaining contaminant levels is protective of human health and the environment, the Permittee shall present a post-closure plan to the Administrative Authority for approval. If any waste residue or contaminated media are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 through 3527, including maintenance and monitoring throughout the post-closure care period.

V.B. CONTAINER STORAGE

The permit conditions as set forth under this Condition shall apply where applicable, to the permitted container storage areas as designated in Condition IV.B, Table 2. The Permittee shall manage all hazardous waste containers in accordance with the approved Waste Analysis Plan referenced in Attachment 1 of this permit.

V.B.1. The Permittee shall be in compliance with all appropriate conditions set forth in LAC 33:V.2101.

V.B.2. The Permittee must transfer hazardous waste from a container that is not in good condition (e.g., severe rusting, apparent structural defects) or is beginning to leak to a container that is in good condition in accordance with LAC 33:V.2103. Alternatively, the Permittee may manage the hazardous waste in a manner that complies with LAC 33:V.Chapter 21, and the provisions of the approved waste analysis plan referenced in Attachment 1 of this permit.

V.B.3. In accordance with LAC 33:V.2107.A, containers holding hazardous waste always must be closed during storage, except when it is necessary to add or remove waste.

V.B.4. In accordance with LAC 33:V.2107.B, the Permittee must not open, handle or store containers holding hazardous waste in a manner which may rupture the container or cause it to leak.

V.B.5. The Permittee must inspect the containers and storage areas in accordance with LAC 33:V.2109 and LAC 33:V.1509. Results of such inspections must be placed in the

operating record in accordance with LAC 33:V.1529.B.8.

V.B.6. Within twenty-four (24) hours of detecting a reportable leak or reportable spill from any container(s), the Permittee shall report the leak or spill in accordance with either Condition II.E.16 (Emergency Unauthorized Discharge) or Condition II.E.17 (Non- Emergency Unauthorized Discharge) of this permit.

V.B.7. The Permittee shall store all wastes in containers that are compatible with the hazardous wastes as required by LAC 33:V.2105. Hazardous wastes being transported offsite must be packaged and labeled in accordance with DOT standards listed in 49 CFR 173 and 178 as required by LAC 33:V.1109 and LAC 33:V.1759.F.

V.B.8. The Permittee must have and operate a containment system for a container storage area containing free liquids in accordance with LAC 33:V.2111.A, B.1, 2, and 4, in a manner such that:

V.B.8.a. the base underlying the containers must be free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed;

V.B.8.b. the base underlying the containers must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquid;

V.B.8.c. run-on into the containment system must be prevented unless the collection system has sufficient excess capacity in addition to that required by LAC 33:V.2111.B.3 to contain any run-on which might enter the system.

V.B.9. The Permittee must manage any collected material as required by LAC 33:V.2111.B.6. Storm water shall be contained until an analysis establishes it meets permit limitation criteria for discharge through the NPDES treatment system, or other authorized disposal method. The Permittee must manage any collected storm water as required by LAC 33:V.2111.B.6 and any other applicable regulations.

V.B.10. The Permittee must place and store incompatible, ignitable, and reactive wastes only in accordance with LAC 33:V.1517, 2113, and 2115.

V.B.11. The Permittee shall store hazardous waste (where applicable) on pallets no more than two (2) tiers of pallets high and no more than four (4) large containers per pallet. All containers must be stacked in such a fashion that each container identification label can be read from the access aisle in accordance with LAC 33:V.2109.B. The pallets and roll-off boxes shall be placed in rows with a minimum of two (2) feet of aisle space between rows. For containers with less than forty (40) gallons capacity, two (2) levels of containers may be stored per pallet, provided the containers are consistent in size and are not miss-shaped, bent or broken. Roll-off boxes must remain covered when not in use

and must be clearly labeled in order to easily identify hazardous waste.

V.B.12. The Permittee must insure that all hazardous waste personnel receive initial and continued training to insure compliance with LAC 33:V.1515, and maintain an emergency response program in compliance with LAC 33:V.1525.

V.B.13. The Permittee must control and report all point source discharges according to LAC 33:V.1505.

V.B.14. Spilled or leaked waste shall be removed from the sump or other collection area in a timely manner as necessary to prevent overflow of the collection system as required by LAC 33:V.2111.B.5.

V.B.15. Waste analysis and other documentation regarding compatibility testing must be placed in the operating record in accordance with LAC 33:V.2115.D.

V.B.16. The Permittee shall not exceed the maximum capacity listed under Condition IV.B, of this permit for each container storage area listed.

V.B.17. At closure, the Permittee shall adhere to the procedures detailed in the approved closure plan referenced in Attachment 1 of this permit and as required by LAC 33:V.2117 and Chapter 35, Closure Requirements.

A Post-Closure Plan must be submitted for each container storage area failing to achieve clean closure (or an alternate closure standard approved under LAC 33:V.3501.D.2 or LAC 33:V.3507.B.) within 90 days from the date that the Permittee or Administrative Authority determines that the unit must be closed as a landfill. The Post-Closure Plan must meet the requirements of LAC 33:V.3523.B.

V.B.18. The Permittee shall always maintain enough secondary containment capacity to contain at least ten percent (10%) of the total volume of containers or the volume of the largest container, whichever is greater in accordance with LAC 33:V.2111.B.3. Containers that do not contain free liquids (per the Paint Filter Liquids Test) do not need to be considered in this determination.

V.B.19. Air Emission Control Equipment Standards

(RESERVED)

Note: In order to prevent redundant regulation, this condition and Condition VII.B (AA-BB Air Regulations) have been reserved. The Permittee will comply with the air emission control equipment standards of LAC 33:V.Chapter 17 by complying with the provisions of its Comprehensive Fugitive Emissions Monitoring Program implemented under the facility air permit. Failure by the Permittee to comply with those provisions that are equivalent to the provisions in LAC 33:V.Chapter 17 will also result in a failure to comply with LAC 33:V.Chapter 17.

V.C. GENERAL REQUIREMENTS FOR BOILERS

V.C.1. Inspections

V.C.1.a. Requirements

V.C.1.a.(1). The Permittee shall inspect the boiler and instrumentation in accordance with Table 5 of this permit.

V.C.1.a.(2). The boilers and associated equipment (pumps, valves, pipes, fuel storage tanks, and other ancillary equipment) will be subject to a daily thorough, visual inspection, when they contain hazardous waste. The purpose of these inspections will be to identify leaks, spills, fugitive emissions, and signs of tampering. At a minimum, operational testing of the automatic waste feed cut off system must be conducted at least monthly, (LAC 33:V.3005 F.3 and F.4).

V.C.1.b. Records

V.C.1.b.(1). Written inspection records shall be part of the operating record for this permit and are hence subject to LAC 33:V.1529 requirements. At a minimum, the record shall include the following information: (1) the date and time of the inspection, (2) inspector's name, (3) any inspection observations, and (4) date and nature of corrective action. The inspection record shall be completed in accordance with LAC 33:V.1509 and shall be available at all times to the Administrative Authority.

Electronic records may be maintained, in lieu of paper copies.

V.C.1.b.(2). A written record of the automatic waste feed cut-off system tests shall be part of the operating record for this permit and shall be available at all times to the Administrative Authority.

Electronic records may be maintained, in lieu of paper copies.

V.C.2. Monitoring and Calibration

V.C.2.a. Requirements

V.C.2.a.(1). The Permittee shall maintain, calibrate, and operate continuous monitors that monitor and record the operating conditions specified in Conditions V.C of this permit. The continuous monitoring requirements shall be as specified in Table 8 and 11 of this permit. (LAC 33:V.3005.F)

V.C.2.a.(2). The Administrative Authority may request data be submitted in any format or units that facilitates the completion of air modeling, risk assessment, or compliance procedures.

V.C.2.a.(3). Monitoring samples and measurements shall be representative of the

monitored activity. The method used to obtain a representative sample of the waste to be analyzed shall be the appropriate method specified in LAC 33:V. Chapter 49.Appendix D or an equivalent method approved by the Administrative Authority.

Other sampling and analytical methods shall be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, SW-846, as revised; *Standard Methods for the Examination of Water and Wastewater*, current edition, or equivalent methods.

V.C.2.a.(4). The Permittee must calibrate the equipment specified in Table 8 and 11 according to the manufacturer's specifications. Calibration procedures shall be included in the operating record of the facility and available at all times for review by the Administrative Authority.

V.C.2.a.(5). Hazardous waste may continue to be introduced into the boilers during daily continuous emission monitoring system (CEMS) calibration check periods. The CEMS shall be maintained according to the following schedule: (1) at least daily, a calibration check of the instrument; (2) at least daily, a system audit; (3) at least quarterly, a calibration error test; and (4) at least annually, a performance specification test. The procedures for CEMS maintenance are outlined in 40 CFR 266 Appendix IX Condition 2.0, "Performance Specifications for Continuous Emission Monitoring Systems."

V.C.2.b. Records

In the operating record, the Permittee shall record and maintain in accordance with LAC 33:V.1529 all monitoring data compiled to satisfy the permit requirements. Minimum monitoring requirements are summarized in LAC 33:V.3005.F. In accordance with LAC 33:V.3005.F.2, all continuous monitors shall record data in units corresponding to the permit limit unless otherwise specified in the permit.

Electronic records may be maintained, in lieu of paper copies.

V.C.3. Performance Standards

V.C.3.a. Requirements

The Permittee shall comply with the performance standards specified in this Permit when hazardous waste is burned in the boilers (LAC 33:V.3009-3015).

V.C.3.a.(1). The boilers shall achieve a Destruction and Removal Efficiency (DRE) of 99.99 percent for each principal organic hazardous constituent (POHC). The DRE shall be determined by using the method specified in LAC 33:V.3009.A.

V.C.3.a.(2). The Permittee shall control hydrogen chloride (HCl) emissions such

that the rate of emission from the stack is no greater than that specified in LAC 33:V.3015.

V.C.3.a.(3). The emissions of particulate matter shall not exceed 0.08 grains per dry standard cubic foot of stack gas, corrected to 7 percent oxygen by volume, in accordance with the formula specified in LAC 33:V.3011.

V.C.3.a.(4). The emissions of carbon monoxide, corrected to 7 percent oxygen, shall not exceed 100 parts per million by volume on an hourly rolling average in accordance with LAC 33:V.3009.B.

V.C.3.b. Records

The Permittee shall record in the facility operating record all occasions on which waste is fed to the boilers and when the operating limits specified in this permit are exceeded.

Electronic records may be maintained, in lieu of paper copies.

V.C.4 Automatic Waste Feed Cut Off

V.C.4.a. Requirements

V.C.4.a.(1). The Permittee shall operate the systems specified in Table 6 and 9 of this permit to automatically cut off the hazardous waste feed when the monitored operating conditions deviate from the set points specified in the permit.

V.C.4.a.(2). Operating parameters for which permit limits are established must continue to be monitored following the cut off, and the hazardous waste feed shall not be restarted until the levels of those parameters that caused the automatic waste feed cut off are restored to permit limits. All other parameters must also be within permit limits.

V.C.4.a.(3). In the event of a malfunction of the automatic waste feed cut off system, the Permittee shall immediately cut off and/or lock out the waste feed.

V.C.4.b. Records

V.C.4.b.(1). The Permittee shall record in the facility operating record the date and time of all automatic waste feed cut off events. The records shall also include the known or suspected cause of the automatic waste feed cut off, the triggering parameters, the corrective actions taken, the duration of the event, and the date and time of restarting waste feed following the automatic waste feed cut off. Electronic records may be maintained, in lieu of paper copies.

V.C.4.b.(2). The Permittee shall record in the facility operating record all failures of the automatic waste feed cut off system, including the date and time of the failure, a description of the failure, root cause of the failure, and corrective actions taken.

V.C.4.b.(3). The operating record shall be maintained in an organized manner for a period of not less than 3 years and be available at all times for inspection by the Administrative Authority (LAC 33:V.3005.H).

V.C.5. Reports

The date, cause, and remedial action for each waste feed cut off activation shall be documented in the operating record. A summary of such occurrences must be included in the annual report. The Permittee shall report in writing to the Administrative Authority if there are more than fifty (50) permit required waste feed cut offs per month. This report shall include cause and remedial actions taken.

V.C.6. Regulation of Residues

The Permittee shall regulate all hazardous waste combustion residues in accordance with LAC 33:V.3025.

TABLE 5
INUDSTRAIL FURNACE INSPECTIONS

EQUIPMENT/INSTRUMENT	INSPECTION ELEMENTS	INSPECTION FREQUENCY
Burner System	Leak in manifold	Daily
Waste Feed System	Atomizing Fluid Pressure Transducer	Daily
	Waste Feed Pressure Transducer	Daily
	Waste Feed Flowmeter	Daily
Waste Tank System	Tank Integrity	Daily
	Level Controls	Daily
	Overflow Alarms and Controls	Daily
	Secondary Containment	Daily
Boiler	Fugitive Emissions	Daily
	Refractory	Every Turnaround
Continuous Process Monitors	Out-of-Tolerance Operational Data	Daily
Automatic Waste Feed Cut Off (AWFCO) System	Operability	Monthly

V.D. SPECIFIC OPERATING CONDITIONS FOR SARU NO. 1

V.D.1. Permitted and Prohibited Wastes

V.D.1.a. The Permittee may only burn hazardous wastes with EPA waste codes listed in the current RCRA Subtitle C Site Identification Form (Part A Permit Application) except as prohibited in Condition V.D.1.b.

V.D.1.b. The burning of the following waste is prohibited:

V.D.1.b.(1). Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901.

V.D.1.b.(2). Polychlorinated biphenyl (PCB) waste, as defined in 40 CFR Part 761.3.

V.D.1.b.(3). Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV.

V.D.1.b.(4). Explosive material, as defined by the Department of Transportation under 49 CFR Part 173.

V.D.1.b.(5). Municipal Waste.

V.D.1.b.(6). Containerized Gases.

V.D.1.b.(7). Medical/Infectious wastes as defined in 40 CFR 60.51.c.

V.D.1.b.(8). Metal bearing wastes listed in LAC 33:V.Chapter 22.Table 11, except as described in LAC 33:V.2207.C.

V.D.1.b.(9). Wastes displaying the characteristic of reactivity as defined in LAC 33:V.4903.D.

V.D.1.c. Before burning any wastes not authorized under this permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

V.D.2. Process Operating Conditions

The unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit. (LAC 33:V.3005.E.1 and LAC 33:V.3005.E.2.c) Tables 7 and 8 of this section outline the operating permit limits for SARU Unit 1. The proposed permit limits are protective limits designed to be effective after planned alterations to the non-RCRA portion of SARU Unit 1 in accordance with Consent Decree, Settlement No.

SA-AE-07-0015.

Whenever hazardous waste is in the boiler, the unit must be kept totally sealed to protect against the escape of fugitive emissions. In accordance with LAC 33:V.3005.E.7, the Permittee must monitor the outside of the combustion unit for signs of fugitives at least daily or document a continuous negative pressure in the combustion chamber.

V.D.2.a. Group A Parameter Limits

The Permittee shall operate the boiler with a functioning system to automatically cut off waste feed to the combustion unit when operating conditions deviate from those established below in Table 6.

V.D.2.a.(1). The combustion gas velocity shall be calculated using the following equation:

$$V_G = \frac{m_s * (H_s - H_w) * 0.7302(T_1 + 460)}{(T_1 - T_2) * Cp * 60}$$

Where:
V_G = Volume of gas (acfm) – calculated
m_s = Mass of steam produced – measured
H_s = Enthalpy of steam (BTU/lb) - assumed constant
H_w = Enthalpy of boiler feed water (BTU/lb) - assumed constant
T_1 = Gas inlet temperature to boiler (°F) – measured
T_2 = Gas outlet temperature from boiler (°F) – measured
Cp = Gas heat capacity (BTU/lb °F) – assumed constant

V.D.2.a.(2). If the parameters in the equation deviate to cause error in the calculation in Condition V.D.2.a.(1)., the facility shall correct for errors.

V.D.2.b. Group B Parameter Limits

The Permittee shall operate the boiler without exceeding the limits in Table 7, although these limits are not part of the automatic waste feed cut off set points. In addition, O_2 shall be monitored continuously whenever hazardous waste is in the boiler, in accordance with CEMS regulations. O_2 level is provided as a correction factor, and as such, no limit is provided under this condition.

V.D.2.c. Group C Parameter Limits

The Permittee shall operate the boiler without exceeding these limits and the limits in Table 7, although these limits are not part of the automatic waste feed cut off set points.

V.D.2.c.(1) Whenever hazardous waste is in the unit, the Permittee shall maintain the waste feed in a flowable form.

V.D.2.c.(2) The Permittee shall immediately stop the flow of hazardous waste into the combustion unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.

V.D.2.c.(3) At a minimum, the Permittee shall analyze values from the Continuous Emissions Monitoring System (CEMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements in accordance with 40 CFR 266 Appendix IX Condition 2.1.2.1.

V.D.2.c.(4) For a Continuous Process Monitoring System (CPMS) operated to ensure compliance with these regulations, the Permittee must maintain and operate the monitors consistent with the manufacturer's specifications.

V.D.2.c.(5) At a minimum, the Permittee shall analyze values from the Continuous Process Monitoring System (CPMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements.

TABLE 6
GROUP A PARAMETER LIMITS FOR THE SARU NO. 1
(AUTOMATIC WASTE FEED CUT OFFS)

CONTROL PARAMETER	FINAL OPERATING LIMITS AUTOMATIC WASTE FEED CUT OFF POINT
Maximum Hazardous Waste Feed Rate (lb/min)	277.1 hourly rolling average
Maximum Combustion Chamber Temperature, (°F)	2158.91 hourly rolling average
Minimum Combustion Chamber Temperature, (°F)	1863.40 hourly rolling average
Minimum ESP Power (kV)	1 65.70 hourly rolling average 2 67.85 hourly rolling average 3 64.41 hourly rolling average 4 66.41 hourly rolling average
Maximum Combustion Gas Velocity (ACFM)	182,342.42 hourly rolling average
Maximum Combustion Chamber Pressure, (Inches H_2O Column)	-0.1 10 seconds
Maximum Carbon Monoxide Concentration, (ppmv)	100 hourly rolling average

TABLE 7
GROUP B & C PARAMETER LIMITS FOR SARU NO. 1

CONTROL PARAMETER	FINAL OPERATING LIMITS
Minimum Waste atomizing pressure (psig)	30 hourly rolling average
Maximum ash feed rate (lb/hr)	431.0 hourly rolling average
Maximum total chlorine and HCl feed rate (Tier III) (lb/hr)	1990.0 hourly rolling average
Maximum Acid Production Rate (tons H_2SO_4/hr)	34.30 hourly rolling average
Minimum Production Rate % SO_2 at converter	3.0 hourly rolling average
Maximum Viscosity (cp)	1620 at feed conditions
Maximum Quench Tower Exit Temperature (°F)	225 hourly rolling average
Maximum DCGC Exit Temperature (ESP Inlet) (°F)	120 hourly rolling average
Maximum Metals Feed Rate, lbs/hr Total Feed Streams	
Maximum feed rate of Antimony (Adjusted Tier 1)[1]	9.3 hourly rolling average
*Maximum feed rate of Arsenic (Mode A Tier III)[1]	36.0 hourly rolling average
Maximum feed rate of Barium (Adjusted Tier 1)[1]	1554.4 hourly rolling average
*Maximum feed rate of Beryllium (Mode A Tier III)[1]	3.7 hourly rolling average
*Maximum feed rate of Cadmium (Mode A Tier III)[1]	45.00 hourly rolling average
*Maximum feed rate of Chromium (Mode A Tier III)[1]	57.6 hourly rolling average
Maximum feed rate of Lead (Adjusted Tier 1)[1]	2.8 hourly rolling average
Maximum feed rate of Mercury (Mode A Tier III)[1]	0.30 hourly rolling average
Maximum feed rate of Silver (Adjusted Tier 1)[1]	93.3 hourly rolling average
Maximum feed rate of Thallium (Adjusted Tier 1)[1]	9 .3 hourly rolling average

[1] **Compliance with the short term limits presented in Table 7 does not necessarily ensure compliance with the long term five (5) year cumulative, risk-based limits presented in Table 12. The Permittee must operate the Industrial Furnace in a manner which complies with the limits presented in both Table 7 and Table 12.**

*The feed rate of arsenic, beryllium, cadmium, and chromium is limited to a level such that the sum of the ratios of the actual feed rate to the feed rate limit specified in Table 7 shall not exceed 1.0, as provided by the following equation:

$$\sum_{i=1}^{n} AFR_{(i)}/FRL_{(i)} \leq 1.0$$

$AFR_{(i)}$ = **Actual Feed Rate (AFR)** The actual feed rate of carcinogenic metal (i) introduced into the combustion chamber from all boiler feedstreams.

N = Number of Carcinogenic Metals.

$FRL_{(i)}$ = **Feed Rate Limit (FRL)**
The regulatory feed limit of carcinogenic metal (i) listed in Table 7

‡The feed rate of antimony, barium, lead, silver, and thallium may be balanced between the two units based upon the following equation:

$$\frac{FR_{i1}}{FR_{i1(max)}} + \frac{FR_{i2}}{FR_{i2(max)}} = 1$$

FR_{i1} = the pollutant i feed rate for Unit No. 1
$FR_{i1(max)}$ = the maximum allowable pollutant i feed rate for Unit No. 1
FR_{i2} = the pollutant i feed rate for Unit No. 2
$FR_{i2(max)}$ = the maximum allowable pollutant i feed rate for Unit No. 2

TABLE 8
INSTRUMENTATION TO BE CALIBRATED TO MANUFACTURER'S SPECIFICATIONS FOR SARU NO. 1

CONTROL PARAMETER	INSTRUMENT DESCRIPTION	LOCATION	CALIBRATION FREQUENCY
Hazardous Waste Feed Rate	Differential, Diaphragm-Type Transducer, Orifice	In feed line, upstream from the waste burner	Every 1.5 years
Forced Draft Fan Flow Rate	Differential, Diaphragm-Type Transducer, Air Foil	Forced draft fan outlet	Every 1.5 years
Stack Gas Oxygen	Paramagnetic	Extracted sample from the exhaust stack	Daily calibration check, calibrate per 40 CFR 266 Appendix IX specifications
Stack Gas Carbon Monoxide	Infrared Cell	Extracted sample from the exhaust stack	Daily calibration check, calibrate per 40 CFR 266 Appendix IX specifications
Atomizing Fluid Pressure	Pressure Switch	In atomizing stream	Every 1.5 years
Steam Production Rate	Differential, Diaphragm-Type Transducer, Orifice	In steam header	Every 1.5 years

V.E. SPECIFIC OPERATING CONDITIONS FOR SARU NO. 2

V.E.1. Permitted and Prohibited Wastes

V.E.1.a. The Permittee may only burn hazardous wastes with EPA waste codes listed in the current RCRA Subtitle C Site Identification Form (Part A Permit Application) except as prohibited in Condition V.C.1.b.

V.E.1.b. The burning of the following waste is prohibited:

V.E.1.b.(1). Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901.

V.E.1.b.(2). Polychlorinated biphenyl (PCB) waste, as defined in 40 CFR Part 761.3.

V.E.1.b.(3). Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV.

V.E.1.b.(4). Explosive material, as defined by the Department of Transportation under 49 CFR Part 173.

V.E.1.b.(5). Municipal Waste.

V.E.1.b.(6). Containerized Gases.

V.E.1.b.(7). Medical/Infectious wastes as defined in 40 CFR 60.51.c.

V.E.1.b.(8). Metal bearing wastes listed in LAC 33:V.Chapter 22.,Table 11, except as described in LAC 33:V.2207.C.

V.E.1.b.(9). Wastes displaying the characteristic of reactivity as defined in LAC 33:V.4903.D.

V.E.1.c. Before burning any wastes not authorized under this permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

V.E.2. Process Operating Conditions

The unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit. (LAC 33:V.3005.E.1 and LAC 33:V.3005.E.2.c) Tables 10 and 11 of this section outline the operating permit limits for SARU Unit 2. The proposed permit limits are protective limits designed to be implemented after planned alterations to the non-RCRA portion of SARU Unit 2 in accordance with Consent

Whenever hazardous waste is in the boiler, the unit must be kept totally sealed to protect against the escape of fugitive emissions. In accordance with LAC 33:V.3005.E.7, the Permittee must monitor the outside of the combustion unit for signs of fugitives at least daily or document a continuous negative pressure in the combustion chamber.

V.E.2.a. Group A Parameter Limits

The Permittee shall operate the boiler with a functioning system to automatically cut off waste feed to the combustion unit when operating conditions deviate from those established below in Table 9.

V.E.2.a.(1). The combustion gas velocity shall be calculated using the following equation:

$$V_G = \frac{m_s * (H_s - H_w) * 0.7302(T_1 + 460)}{(T_1 - T_2) * Cp * 60}$$

Where:
V_G = Volume of gas (acfm) – calculated
m_s = Mass of steam produced – measured
H_s = Enthalpy of steam (BTU/lb) - assumed constant
H_w = Enthalpy of boiler feed water (BTU/lb) - assumed constant
T_1 = Gas inlet temperature to boiler (°F) – measured
T_2 = Gas outlet temperature from boiler (°F) – measured
Cp = Gas heat capacity (BTU/lb °F) – assumed constant

V.E.2.a.(2). If the parameters in the equation deviate to cause error in the calculation in Condition V.E.2.a.(1)., the facility shall correct for errors.

V.E.2.b. Group B Parameter Limits

The Permittee shall operate the boiler without exceeding the limits in Table 10, although these limits are not part of the automatic waste feed cut off set points. In addition, O_2 shall be monitored continuously whenever hazardous waste is in the boiler, in accordance with CEMS regulations. O_2 level is provided as a correction factor, and as such, no limit is provided under this condition.

V.E.2.c. Group C Parameter Limits

The Permittee shall operate the boiler without exceeding these limits and the limits in Table 10, although these limits are not part of the automatic waste feed cut off set points.

V.E.2.c.(1) Whenever hazardous waste is in the unit, the Permittee shall maintain the waste feed in a flowable form.

V.E.2.c.(2) The Permittee shall immediately stop the flow of hazardous waste into the combustion unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.

V.E.2.c.(3) At a minimum, the Permittee shall analyze values from the Continuous Emissions Monitoring System (CEMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements in accordance with 40 CFR 266 Appendix IX Condition 2.1.2.1.

V.E.2.c.(4) For a Continuous Process Monitoring System (CPMS) operated to ensure compliance with these regulations, the Permittee must maintain and operate the monitors consistent with the manufacturer's specifications.

V.E.2.c.(5) At a minimum, the Permittee shall analyze values from the Continuous Process Monitoring System (CPMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements.

TABLE 9
GROUP A PARAMETER LIMITS FOR SARU NO. 2
(AUTOMATIC WASTE FEED CUT OFFS)

CONTROL PARAMETER	FINAL OPERATING LIMITS AUTOMATIC WASTE FEED CUT OFF POINT
Maximum Hazardous Waste Feed Rate, (lbs/min)	430.63 hourly rolling average
Maximum Combustion Chamber Temperature, (°F)	2168.63 hourly rolling average
Minimum Combustion Chamber Temperature, (°F)	1866.62 hourly rolling average
Minimum ESP Power, (kV)	East 64.8 hourly rolling average West 65.0 hourly rolling average
Maximum Combustion Gas Velocity, (ACFM)	288,829.92 hourly rolling average
Maximum Combustion Chamber Pressure, Inches H_2O Column	-0.1 10 seconds
Maximum Carbon Monoxide Concentration, (ppmv)	100 hourly rolling average

TABLE 10
GROUP B & C PARAMETER LIMITS FOR SARU NO.2

CONTROL PARAMETER	FINAL OPERATING LIMITS
Minimum Waste atomizing pressure, (psig)	30 hourly rolling average
Maximum ash feed rate, (lb/hr)	1672.3 hourly rolling average
Maximum total chlorine and HCl feed rate (Tier III), (lb/hr)	2,500 hourly rolling average
Maximum Acid Production Rate, (tons H_2SO_4/hr)	73.53 hourly rolling average
Minimum Production Rate, $\%SO_2$ at converter	3.0 hourly rolling average
Maximum Viscosity, cp	1620 at feed conditions
Maximum Quench Tower Exit Termperature, (°F)	225 hourly rolling average
Maximum DCGC Exit Temperature (ESP Inlet), (°F)	120 hourly rolling average
Maximum BIF Metals Feed Rate, lbs/hr Total Feed Streams	
Maximum feed rate of Antimony (Adjusted Tier 1)[1]	13.4 hourly rolling average
*Maximum feed rate of Arsenic (Mode A Tier III)[1]	45.3 hourly rolling average
Maximum feed rate of Barium (Adjusted Tier 1)[1]	2238.3 hourly rolling average
*Maximum feed rate of Beryllium (Mode A Tier III)[1]	4.5 hourly rolling average
*Maximum feed rate of Cadmium (Mode A Tier III)[1]	45.0 hourly rolling average
*Maximum feed rate of Chromium (Mode A Tier III)[1]	63.7 hourly rolling average
Maximum feed rate of Lead (Adjusted Tier 1)[1]	4.0 hourly rolling average
Maximum feed rate of Mercury (Mode A Tier III)[1]	0.30 hourly rolling average
Maximum feed rate of Silver (Adjusted Tier 1)[1]	134.3 hourly rolling average
Maximum feed rate of Thallium (Adjusted Tier 1)[1]	13.4 hourly rolling average

[1] Compliance with the short term limits presented in Table 10 does not necessarily ensure compliance with the long term five (5) year cumulative, risk-based limits presented in Table 12. The Permittee must operate the Industrial Furnace in a manner which complies with the limits presented in both Table 7 and Table 12.

*The feed rate of arsenic, beryllium, cadmium, and chromium is limited to a level such that the sum of the ratios of the actual feed rate to the feed rate limit specified in Table 10 shall not exceed 1.0, as provided by the following equation:

$$\sum_{i=1}^{n} AFR_{(i)}/FRL_{(i)} \leq 1.0$$

$AFR_{(i)}$ = **Actual Feed Rate (AFR)** The actual feed rate of carcinogenic metal (i) introduced into the combustion chamber from all boiler feedstreams.

N = Number of Carcinogenic Metals.

$FRL_{(i)}$ = **Feed Rate Limit (FRL)**
The regulatory feed limit of carcinogenic metal (i) listed in Table 10

‡The feed rate of antimony, barium, lead, silver, and thallium may be balanced between the two units based upon the following equation:

$$\frac{FR_{i1}}{FR_{i1(max)}} + \frac{FR_{i2}}{FR_{i2(max)}} = 1$$

FR_{i1} = the pollutant i feed rate for Unit No. 1
$FR_{i1(max)}$ = the maximum allowable pollutant i feed rate for Unit No. 1
FR_{i2} = the pollutant i feed rate for Unit No. 2
$FR_{i2(max)}$ = the maximum allowable pollutant i feed rate for Unit No. 2

TABLE 11
INSTRUMENTATION TO BE CALIBRATED TO MANUFACTURER'S SPECIFICATIONS FOR SARU NO.2

CONTROL PARAMETER	INSTRUMENT DESCRIPTION	LOCATION	CALIBRATION FREQUENCY
Hazardous Waste Feed Rate	Differential, Diaphragm-Type Transducer, Orifice	In feed line, upstream from the waste burner	Every 1.5 years
Forced Draft Fan Flow Rate	Differential, Diaphragm-Type Transducer, Air Foil	Forced draft fan outlet	Every 1.5 years
Stack Gas Oxygen	Paramagnetic	Extracted sample from the exhaust stack	Daily calibration check, calibrate per 40 CFR 266 Appendix IX specifications
Stack Gas Carbon Monoxide	Infrared Cell	Extracted sample from the exhaust stack	Daily calibration check, calibrate per 40 CFR 266 Appendix IX specifications
Atomizing Fluid Pressure	Pressure Switch	In atomizing stream	Every 1.5 years
Steam Production Rate	Differential, Diaphragm-Type Transducer, Orifice	In steam header	Every 1.5 years

V.F. RISK-BASED CONDITIONS

V.F.1. Definitions:

V.F.1.a. Annual Sampling Mode: A rate of sampling once per twelve (12) months, but no closer than 200 days or longer than 530 days since the last sampling.

V.F.1.b. Quarterly Sampling Mode: A rate of sampling once per every three (3) months, but no closer than forty (40) days or longer than 140 days since the last sampling.

V.F.1.c. Monthly Sampling Mode: A rate of sampling once every month, but no closer than ten (10) days or longer than fifty (50) days since the last sampling.

V.F.1.d. Analytical Database: A record of analytical results from all hazardous waste feed metal samples taken, voluntarily or required. This database contains all data obtained whether used in calculating a five (5) year rolling total metals feed rate or not.

V.F.1.e. Five (5) Year Rolling Total Metals Feed: A time-weighted calculation of total mass of a metal fed to the Industrial Furnace based upon analysis results obtained during the previous sixty months. Invalidated data shall not be used in calculating this total. The time weighting of data will be from the date of sampling that generates valid data to the next sampling date when valid data is obtained. This value is a monthly rolling total.

V.F.1.f. Five (5) Year Metals Feed Guideline: A site-specific, risk-based guideline based upon an EPA Risk Assessment and plant operations during the Risk Assessment Burn. The guideline value is calculated using EPA's grams per second mass flow rate results from the risk assessment and projecting that flow over sixty (60) months, including one (1) leap day.

V.F.2. For each permitted hazardous waste the Permittee shall conduct total metals sampling and analysis for antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, nickel, selenium, silver and thallium.

V.F.2.a. For single feed streams that are continuous with a demonstrated standard deviation, the Permittee shall sample each feed stream to the SARU units four (4) times annually (referred to as quarterly sampling mode), unless the provisions of Conditions V.F.7 or V.F.8 below apply or otherwise approved by LDEQ.

V.F.2.b. LDEQ/EPA-approved sampling and analytical methods (e.g., "Test Methods for Evaluating Solid Waste – Physical/Chemical Methods", SW-846) shall be used unless the Permittee obtains approval from the LDEQ to use another method.

V.F.2.c. This facility is a commercial facility that may use smaller, short-term batch feed streams. The facility shall sample and analyze these smaller, short-term feed streams in accordance with the approved Waste Analysis Plan (WAP). These sampling and analysis

techniques include the use of upper tolerance levels (UTLs) described in Section 2.2.1.d of the WAP and composite sampling to measure actual feed streams.

V.F.3. The site-specific, risk-based guidelines are based upon the Risk Assessment conducted for the Permittee. These recommended guidelines are annual average values since the risk assessment evaluated risk over a thirty (30) year operating time period. In determining the metal mass flow rate for each hazardous waste to compare to the site-specific, risk-based guideline for that metal, the Permittee shall calculate a five (5) year rolling total metals feed to both SARU units from the valid data in the analytical database.

V.F.4. The Permittee shall not exceed:

V.F.4.a. The five (5) year metals feed guideline specified in Tables 13 and 14 when calculating the total metals feed for any metal over the previous twelve (12) months; and

V.F.4.b. After five (5) years from the effective date of this permit, the five (5) year metals feed guideline in Tables 13 and 14 when calculating the five (5) year rolling total metals feed for any metal over the previous sixty (60) months (an exceedance of Condition V.F.4.a above shall not constitute an exceedance of this Condition V.F.4.b).

V.F.5. During the initial five (5) year period (which begins on the effective date of this permit) the Permittee may use existing historical data to calculate the five (5) year rolling total metals feed, if that data exists.

V.F.5.a. Combustion units with limited historical data, less than five (5) consecutive years of annual sampling and analysis data shall develop historical data at an accelerated rate by either option listed as follows:

V.F.5.a.(1) Sample at the monthly sampling mode for one (1) year; or

V.F.5.a.(2) Sample at the quarterly sampling mode for five (5) quarters.

V.F.5.b. After completion of the accelerated sampling frequency to develop a historical record, the Permittee may initiate the quarterly or annual sampling mode, as determined by the Permittee's projected five (5) year compliance with the risk-based guidelines in Tables 13 and 14 and as described in Condition V.F.7 and Condition V.F.9 below.

V.F.5.c. For the smaller, short-term batch operations, the metal feed rates must be characterized prior to being fed to the SARU units.

V.F.6. When the five (5) year rolling total metals feed rate for a metal being sampled under the annual sampling mode exceeds the five (5) year metals feed guideline listed in Tables 13 and 14 for that metal during a sampling and analysis event, the Permittee shall increase the sampling frequency for that metal to the quarterly sampling mode.

V.F.7. When the five (5) year rolling total metals feed rate for a metal being sampled under the quarterly sampling mode does not exceed the five (5) year metals feed guideline listed in Tables 13 and 14 for the last five (5) sampling events for that metal, the Permittee may reduce the sampling frequency for that metal to the annual sampling mode.

V.F.8. When the five (5) year rolling total metals feed rate for a metal being sampled under the quarterly sampling mode exceeds the five (5) year metals feed guideline listed in Tables 13 and 14 for that metal during any two (2) of five (5) consecutive sampling and analysis events, the Permittee shall:

V.F.8.a. increase the sampling frequency for that metal in the hazardous waste stream to the monthly sampling mode;

V.F.8.b. investigate the cause of the high metal mass flow rate;

V.F.8.c. determine probable causes for exceeding the site-specific, risk-based guideline for that metal;

V.F.8.d. take corrective measures to demonstrate compliance with the risk-based guidelines for that metal; and

V.F.8.e. notify LDEQ in the annual report referenced in Condition II.E.29 of the exceedance, probable causes of the exceedance and corrective measures taken.

V.F.9. When the five (5) year rolling total metals feed rate for a metal being sampled under the monthly sampling mode does not exceed the five (5) year metals feed guideline listed in Tables 13 and 14 for the last five (5) sampling events for that metal, the Permittee may reduce the sampling frequency for that metal to the quarterly sampling mode.

V.F.10. Data Handling

V.F.10.a. At any time, the Permittee may voluntarily increase the sampling frequency of a metal in a hazardous waste stream.

V.F.10.a.(1) When sampling under a voluntarily-increased frequency, the Permittee may return at any time to the sampling mode for which the metal in the hazardous waste stream was qualified.

V.F.10.a.(2) Sampling and analysis results obtained during the voluntarily-increased sampling frequency shall not be used to increase or reduce the sampling mode.

V.F.10.a.(3) Data obtained during the voluntarily-increased frequency shall be included in the analytical database and used in calculating the five (5) year rolling total metals feed.

V.F.10.b. The Permittee may request that the laboratory immediately re-analyze the sample (replicate analysis) for a metal when data is suspect.

V.F.10.b.(1) All analysis data obtained shall be included in the analytical database.

V.F.10.b.(2) Any data that is considered invalid shall have an explanation defining what basis was used to invalidate the data.

V.F.10.b.(3) Data that is proven to be invalid shall not be used in calculating the five (5) year rolling total metals feed.

V.F.10.b.(4) Replicate sample results may be used as the sampling frequency results when the original sample results have been invalidated.

V.F.10.c. The Permittee may resample the hazardous waste stream and have the sample analyzed for the subject metal when data is suspect.

V.F.10.c.(1) All analysis data obtained shall be included in the analytical database.

V.F.10.c.(2) Any data that is considered invalid shall have an explanation defining what basis was used to prove the invalid nature of that data.

V.F.10.c.(3) Data that is proven to be invalid shall not be used in calculating the five (5) year rolling total metals feed.

V.F.10.c.(4) Re-sampled analytical results are normally considered a voluntary sample and do not impact shifts in sampling frequency. These results are used for calculating the five (5) year rolling total metals feed rate.

V.F.10.c.(5) Re-sampled analytical results can impact sampling frequency when the results from the original samples have been proven to be invalid.

V.F.10.d. The Administrative Authority reserves the right to review the analytical database, to modify, as appropriate, the classification of valid or invalid data, and to re-calculate mass feed rates and the five (5) year rolling total metals feed.

V.F.11. For the metals; antimony, beryllium, cadmium, mercury, silver, thallium and selenium, the Permittee must demonstrate a good-faith effort to monitor and control the metals' feed rates.

V.F.11.a. Demonstrate that the detection limit using the best available analytical technology is at or below the following:

V.F.11.a.(1) 12.5 ppm for lead

V.F.11.a.(2) 0.35 ppm for mercury

V.F.11.b. If the Permittee fails to demonstrate the detection limit is at or below the specified values in Conditions V.F.11.a.(1) through (4), the permittee must demonstrate what the method detection limit is for the sample matrix with the analytical laboratory contracted to perform the analyses in accordance with 40 CFR 136, Appendix B.

V.F.11.c. Should an analysis result indicate the presence of a metal at a concentration greater than the method detection limit, the Permittee shall either reduce the hazardous waste feed rate so that the five (5) year rolling total metals feed does not exceed the five (5) year metals feed guideline or demonstrate that the reported analysis result is invalid.

V.F.12. The Permittee may request that EPA re-evaluate changes in risk assessment methodology or information and/or waste feed characterization and/or facility operations in order to revise the site-specific, risk-based guideline levels. The Permittee shall identify specifically the basis for requesting re-evaluation and within thirty (30) days of the request, the EPA will respond in writing to indicate if and when the re-analysis will be conducted.

TABLE 12
FEED RATE GUIDELINES[1]
SARU 1

Constituent	Average Annual Metals Feed Rate (lbs/yr)	Metals Feed Rate[2] (lbs/hr)	Five (5) Year Maximum Waste Feed (MWF5) (tons)
Antimony	3,504	0.40	8.76
Arsenic	315,360	36.0	789
Barium	3,416	0.39	8.54
Beryllium	32,061	3.66	80.2
Cadmium	394,200	45.0	986
Total Chromium[3]	661,380	75.5	1,654
Lead	1,840	0.21	4.6
Mercury	78.84	0.009	0.20
Nickel	442,380	50.5	1,106
Selenium	5,431	0.62	13.6
Silver	3,504	0.40	8.76
Thallium	1,752	0.20	4.38

[1] Feed rates are based upon a Risk Assessment conducted by the facility and reviewed by the Environmental Protection Agency.
[2] Risk Analysis is based upon both SARU units operating.
[3] Total Chromium established by stack measurement accounting for air pollution control equipment removal efficiency with no Chromium VI partition factor.

TABLE 13
FEED RATE GUIDELINES[1]
SARU 2

Constituent	Average Annual Metals Feed Rate (lbs/yr)	Metals Feed Rate[2] (lbs/hr)	Five (5) Year Maximum Waste Feed (MWF5) (tons)
Antimony	5,782	0.66	14.5
Arsenic	396,828	45.3	992.6
Barium	5,782	0.66	14.5
Beryllium	39,420	4.50	98.6
Cadmium	394,200	45.0	986
Total Chromium[3]	661,380	75.5	1,654
Lead	4,030	0.46	10.08
Mercury	78.84	0.009	0.20
Nickel	442,380	50.5	1,106
Selenium	6,044	0.69	15.12
Silver	5,694	0.65	14.24
Thallium	3,241	0.37	8.11

[1] Feed rates are based upon a Risk Assessment conducted by the facility and reviewed by the Environmental Protection Agency.
[2] Risk Analysis is based upon both SARU units operating.
[3] Total Chromium established by stack measurement accounting for air pollution control equipment removal efficiency with no Chromium VI partition factor.

VI. GROUNDWATER PROTECTION

VI.A. APPLICABILITY

The regulations of Louisiana Administrative Code (LAC), Title 33, Part V, Chapter 3, 5, 15, 19, 21, 33, 35, and 37, and the Louisiana Hazardous Waste Control Law Revised Statute (R.S.) 30:2171 et seq., of the Environmental Quality Control Act, R.S. 30:2001 et seq., and the provisions of this Condition shall apply to ground water protection programs for facilities that are used to treat, store, and dispose hazardous wastes at Rhodia Inc., in Baton Rouge, LA. No active permitted units are identified in this permit that are subject to the groundwater monitoring requirements of LAC 33:V.Chapter 33 at this time.

V1.B. REQUIRED PROGRAMS

The Permittee shall comply with the monitoring, response, and corrective action provisions for the existing and any new systems in accordance with LAC 33:V.Chapter 33 and as outlined in this permit (i.e., Condition VIII, HSWA).

VI.C. CORRECTIVE ACTION

If ground water contamination is confirmed as a result of operations related to past or present hazardous waste management facilities associated with this site, the Permittee shall establish, expand, or continue assessment and corrective action programs in accordance with the requirements of LAC 33:V.Chapter 33 and as subsequently directed by the Administrative Authority.

HAZARDOUS AND SOLID WASTE AMENDMENTS

VII. GENERAL CONDITIONS PURSUANT TO THE HAZARDOUS AND SOLID WASTE AMENDMENTS

VII.A. STANDARD CONDITIONS

VII.A.1. Waste Minimization

Annually, by March 1, for the previous year ending December 31, the Permittee shall enter into the operating record as required by LAC 33:V.1529.B.19, a statement certified according to LAC 33:V.513.A specifying that the Permittee has a program in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined by the Permittee to be economically practicable; and that the proposed method of treatment, storage, or practicable disposal method that is currently available to the Permittee minimizes the present and future threat to human health and the environment. A current description of the program shall be maintained in the operating record and a copy of the annual certified statement shall be submitted to the Administrative Authority. The following criteria should be considered for the program:

VII.A.1.a. Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility;

VII.A.1.b. Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities;

VII.A.1.c. An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste;

VII.A.1.d. Factors that have prevented implementation of source reduction and/or recycling;

VII.A.1.e. Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.);

VII.A.1.f. An investigation of additional waste minimization efforts that could be implemented at the facility. This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. The analysis would include an assessment of the technical feasibility, cost, and potential waste reduction for each option;

VII.A.1.g. A flow chart or matrix detailing all hazardous wastes the facility produces by quantity, type, and building/area;

VII.A.1.h. A demonstration of the need to use those processes that produce a particular hazardous waste due to a lack of alternative processes or available technology that would produce less hazardous waste;

VII.A.1.i. A description of the waste minimization methodology employed for each related process at the facility. The description should show whether source reduction or recycling is being employed;

VII.A.1.j. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years; and

VII.A.1.k. The Permittee may meet the requirements for waste minimization by developing an Environmental Management System according to the EPA document, Integrated Environmental Management System Implementation Guide, EPA 744-R-00-011, October 2000, found on the EPA website at www.epa.gov/opptintr/dfe/pubs/iems/iems_guide/index.htm.

VII.A.2. Dust Suppression

Pursuant to LAC 33:V.4139.B.4, and the Toxic Substances Control Act, the Permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.

VII.A.3. Failure to Disclose

The Permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts at any time may be cause for termination or modification of this Permit in accordance with LAC 33:323.B.2 and 3.

VII.A.4. Suspension, Modification, or Revocation and Reissuance, and Termination of Permit

This Permit may be modified, revoked and reissued, or terminated for cause as specified in LAC 33:V.323. The filing of a request by the Permittee for a permit modification, revocation and reissuance, termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition.

VII.A.4.a. If the Administrative Authority tentatively decides to modify or revoke and reissue a permit under LAC 33:V.321.C. or 323, a draft permit shall be prepared incorporating the proposed changes. The Administrative Authority may request additional information and, in the case of a modified permit, may require the submission of an updated permit application.

VII.A.4.b. The Permittee may initiate permit modification proceedings under LAC 33:V.321.C. All applicable requirements and procedures as specified in LAC 33:V.321.C shall be followed.

VII.A.4.c. Modifications of this Permit do not constitute a reissuance of the Permit.

VII.A.5. Permit Review

This Permit may be reviewed by the Administrative Authority five years after the date of permit issuance and may be modified as necessary as provided for in LAC 33:V.321.C. Nothing in this section shall preclude the Administrative Authority from reviewing and modifying the Permit at any time during its term.

VII.A.6. Compliance with Permit

Compliance with a RCRA permit during its term constitutes compliance, for purposes of enforcement, with subtitle C of RCRA except for those requirements not included in the permit which:

VII.A.6.a. Become effective by statute;

VII.A.6.b. Are promulgated under LAC 33:V.Chapter 22 restricting the placement of hazardous wastes in or on the land; or

VII.A.6.c. Are promulgated under LAC 33:V.Chapters 23, 25 and 29 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, construction quality assurance (CQA) programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of LAC 33:V.321.C Class 1 permit modifications.

VII.A.7. Specific Waste Ban

VII.A.7.a. The Permittee shall not place in any land disposal unit the wastes specified in LAC 33:V. Chapter 22 after the effective date of the prohibition unless the Administrative Authority has established disposal or treatment standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this Permit.

VII.A.7.b. The Permittee may store wastes restricted under LAC 33:V.Chapter 22 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of LAC 33:V.2205 including, but not limited to, clearly marking each tank or container.

VII.A.7.c. The Permittee is required to comply with all applicable requirements of LAC 33:V.2245 as amended. Changes to the Waste Analysis Plan will be considered permit modifications at the request of the Permittee, pursuant to LAC 33:V.321.C.

VII.A.7.d. The Permittee shall review the waste analysis plan and analyze the waste when a process changes to determine whether the waste meets applicable treatment standards. Results shall be maintained in the operating record pursuant to Condition III.C.1 and 2.

VII.A.8. Information Submittal for the Corrective Action Strategy

Failure to comply with any condition of the Permit, including information submittals, constitutes a violation of the Permit and is grounds for enforcement action, permit amendment, termination, revocation, suspension, or denial of permit renewal application. Falsification of any submitted information is grounds for termination of this Permit (LAC 33:V.323.B.3).

The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Administrative Authority required by this Permit using the Corrective Action Strategy are signed and certified in accordance with LAC 33:V.Chapter 5, Subchapter B. All submittals required under the corrective action strategy must conform to those requirements outlined in the RECAP (see Condition VIII of this permit). Variance from content and/or formatting guidelines provided under the RECAP shall be requested by the Permittee prior to submittal to the Administrative Authority, as deemed necessary. Approval or disapproval of such a request with further guidance on content and formatting will be provided by the Administrative Authority, as deemed necessary. Five (5) copies each of these plans, reports, notifications or other submissions and one (1) electronic copy (3.5" IBM compatible disk or CD-ROM) of all portions thereof which are in word processing format shall be submitted to the Administrative Authority by Certified Mail or hand delivered to:

Louisiana Department of Environmental Quality
Office of Environmental Assessment
Environmental Technology Division
P.O. Box 4314
Baton Rouge, LA 70821-4314

A summary of the planned reporting milestones pursuant to the corrective action requirements of this Permit is found in Condition VIII, Table 1.

VII.A.9. Data Retention

All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken

pursuant to this Permit shall be maintained at the facility during the term of this Permit, including any reissued Permits.

VII.A.10. Management of Wastes

All solid wastes which are managed pursuant to a remedial measure taken under the corrective action process or as an interim measure addressing a release or the threat of a release from a solid waste management unit shall be managed in a manner protective of human health and the environment and in compliance with all applicable Federal, State and local requirements. As a response to the Louisiana legislature mandate La. R.S. 30:2272 (Act 1092 of the 1995 Regular Session) to develop minimum remediation standards, the LDEQ promulgated the Risk Evaluation Corrective Action Program (RECAP). RECAP's tiered approach to risk evaluation and corrective action establishes not only across the board numerical standards for most media, but also allows for the development of more site-specific numerical standards, as warranted. The Permittee is required to comply with all applicable requirements of RECAP. Approval of units for managing wastes and conditions for operating the units shall be granted through the permitting process.

VII.B. EMISSION STANDARDS - PROCESS VENTS, EQUIPMENT LEAKS, TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS (AA-BB-CC AIR REGULATIONS)

(RESERVED)

VII.C. SPECIFIC CONDITION - CLOSURE

Pursuant to Section 3005(j)(1) of the Hazardous and Solid Waste Amendments of 1984, the Permittee shall close any closing units in accordance with the following provisions:

VII.C.1. Other than consolidation of any wastes from the sites in conformance with LAC 33:V.Chapter 22, Land Disposal Restrictions, the Permittee shall not place waste prohibited by LAC 33:V.Chapter 22 into any closing units;

VII.C.2. The Permittee shall perform unit closures in accordance with the Closure Plan(s) as approved at the time of closure, and which meet(s) all relevant State and Federal closure requirements at the time of closure; and

VII.C.3. The Permittee shall notify the Administrative Authority in writing at least sixty (60) days prior to commencement of closure.

VIII. SPECIAL CONDITIONS PURSUANT TO HAZARDOUS AND SOLID WASTE AMENDMENTS—CORRECTIVE ACTION STRATEGY

Corrective Action for Releases: Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments (HSWA), and LAC 33:V.3322 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste or hazardous constituents from any solid waste management unit at the facility, regardless of when the waste was placed in the unit.

EPA's traditional RCRA corrective action approach is structured around several elements common to most activities. In the first phase, RCRA facility assessment (RFA), EPA or the authorized state assesses the facility to identify releases and determine the need for corrective action. In the second phase, RCRA facility investigation (RFI), the facility conducts a more detailed investigation to determine the nature and extent of contaminants released to ground water, surface water, air, and soil. If remedial action is needed, a third phase, corrective measures study (CMS), is started. During this phase, the facility conducts a study, which when completed, describes the advantages, disadvantages, and costs of various cleanup options. After selection of a final remedy, the fourth phase, corrective measures implementation (CMI), is initiated. The facility is required to design, construct, operate, maintain, and monitor the final remedy(s).

The Corrective Action Strategy (CAS) is an alternate corrective action approach that can be implemented during any phase of corrective action for a release area. The Permittee shall use the CAS approach as the framework for corrective action to clarify, facilitate and expedite the process, and shall use the **Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP)** for screening and media-specific cleanup standards. EPA has interpreted the term "release" to mean, "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." (50 FR 2873, July 15, 1985). The CAS refers to "release areas" as solid waste management units (SWMUs) and areas of concern (AOCs) while the RECAP refers to release areas as areas of investigation (AOIs). SWMUs and AOCs may also be referred to as "AOIs" when investigated and managed under the RECAP.

VIII.A. ALTERNATE CORRECTIVE ACTION

VIII.A.1. Introduction to CAS

This Permit will utilize the CAS Guidance Document (www.epa.gov/Arkansas/6pd/rcra_c/pd-o/riskman.htm) developed by the U.S. Environmental Protection Agency (EPA) Region 6 whenever the Administrative Authority determines that it will serve to facilitate the corrective action. The CAS Guidance Document shall be utilized to the fullest extent practicable for planning and implementation of the corrective action. The CAS in this Permit shall not supersede existing Federal, State, and local regulations. The two primary objectives are to prioritize corrective action at the facility, and streamline corrective action administrative procedures, resulting in the protection of human health and the environment.

The CAS is a performance-based approach; using data quality objectives, investigations begin with the endpoint in mind. The CAS is a risk management strategy that can be implemented during any phase of corrective action. However, the CAS need not be applied to work that has already been completed to the satisfaction of the Administrative Authority. Performance standards are established at the beginning of the corrective action process, allowing earlier and more focused implementation. Releases are screened using RECAP screening numbers to determine the priority of corrective action, and remedial alternatives are selected on the basis of their ability to achieve and maintain the established performance standards.

There is no one specific path through the CAS process. The CAS is a facility-wide approach, focusing corrective action on releases that pose the greatest risk first. Screening releases will also enable some areas of interest to qualify for no further action at this time (Condition VIII.A.3.a.), thus resources can be used to best benefit the protection of human health and the environment. The CAS process also considers activities previously conducted under the traditional corrective action process. Appendix 1 of this permit contains a summary of corrective action activities completed to date and also describes where the Permittee is in the CAS process at the time of issuance of this permit. The applicability of various provisions of the CAS will depend on where the Permittee is in the CAS process as detailed in Appendix 1.

The traditional RCRA corrective action process and reports (i.e., RFIs, CMSs, CMIs, etc.) are not elements of the CAS. However, the use of information and reports from the traditional corrective action process, if available, is encouraged, in addition to new site-specific information.

The Administrative Authority, through an agency-initiated permit modification, may remove the CAS as the means of facility-wide corrective action in the case of the failure of the Permittee to disclose information, abide by the terms and conditions of this permit, adhere to agreed schedules, or show adequate progress; or should an impasse occur between the Permittee and the Administrative Authority. The Administrative Authority will institute other means of corrective action (such as traditional corrective action) at the facility through modification of this permit.

VIII.A.2. Performance Standards

Expectations for the outcome of corrective action at a facility are established in the CAS by three performance standards as defined in Conditions VIII.A.2.a through c. The Permittee's proposed performance standards shall be presented during the scoping meeting. The Permittee must justify the proposed performance standards through evaluation and documentation of land use, ground water designation (current and reasonably expected future use), types of receptors present, exposure pathways, etc.; as described in RECAP, Chapter 2. Through the application of the performance standards and RECAP, the Permittee and Administrative Authority shall determine whether a release must be addressed through corrective action, and whether implemented corrective actions are protective of human health and the environment.

The Permittee shall submit the performance standards in writing along with the Conceptual Site Model (Condition VIII.D) within one-hundred and twenty (120) days after the scoping meeting. The Administrative Authority may either approve the performance standards proposed by the Permittee or establish performance standards that the Administrative Authority deems necessary to protect human health and the environment.

The three CAS performance standards are defined below. The order in which the performance standards are listed does not indicate that one performance standard takes priority over another. All applicable performance standards must be achieved by the Permittee.

VIII.A.2.a. Source Control Performance Standard

Source control refers to the control of materials that include or contain hazardous wastes or hazardous constituents that act as a reservoir for migration of contamination to soil, sediment, ground water, surface water, or air, or as a source for direct exposure.

The facility must determine if source material is present. Removal, containment, treatment, or a combination of the three, must be evaluated on a case-by-case basis. Controlling source material is a predominating issue in the CAS, and must be addressed to ensure protectiveness over time. Prioritization of the SWMUs and AOCs does not mean avoidance of controlling source materials.

VIII.A.2.b. Statutory and Regulatory Performance Standard

Applicable statutory and regulatory requirements (Federal, State, and local) must be identified. These requirements may dictate media-specific contaminant levels (e.g., maximum contaminant levels (MCLs) in drinking water) that must be achieved and may become a performance standard for the Permittee.

VIII.A.2.c. Final Risk Goal Performance Standard

The final risk goal is the level of protection to be achieved and maintained by the Permittee. The final risk goal shall be based on site-specific issues including land use, special subpopulations, contaminant concentrations based on acceptable risk, location at which the levels are measured, and the remediation time frame, as specified by RECAP.

One final risk goal may apply to the entire facility, but it is more likely that different releases will require different final risk goals due to variations in location of releases, land use, proximity of receptors, etc. The final risk goal will be based on sound risk assessment methodologies (Condition VIII.A.3).

VIII.A.3. Use of RECAP

The latest edition of the RECAP document shall be used by the Permittee to determine the need for further corrective actions under this permit. The RECAP consists of a tiered framework comprised of a Screening Option (SO), and three Management Options (MO). The tiered management options allow site evaluation and corrective action efforts to be tailored to site conditions and risks. As the MO level increases, the approach becomes more site-specific and hence, the level of effort required to meet the objectives of the Option increases.

The RECAP shall be used by the Permittee to evaluate data quality and data usability (RECAP Section 2.4 and 2.5), to determine the identity of an AOI as described in RECAP Section 2.6, and for estimations of Area of Investigation Concentrations and Groundwater Compliance Concentrations for each media as defined in RECAP Section 2.8.

The RECAP shall be used by the Permittee to evaluate land use as described in RECAP Section 2.9, and groundwater/aquifer use as described in RECAP Section 2.10.

The RECAP shall be used by the Permittee to prioritize AOCs, SWMUs, and AOIs that require remediation so site investigations are focused on the release areas that pose the greatest risk. As the CSM is compiled, the Permittee shall assess historical data (RECAP Section 2.5) and use the following management options, as appropriate, to address each release site.

VIII.A.3.a. Screening Option

The Permittee shall use the Screening Standards (SS) which are LDEQ-derived screening numbers for soil and groundwater for non-industrial and industrial land use scenarios. The SS shall be used to demonstrate that an AOI does not pose a threat to human health and the environment and, hence does not require further action at this time (NFA-ATT) or that further evaluation is warranted under a higher Management Option.

VIII.A.3.b. Management Option 1

The Permittee shall use Management Option 1 (MO-1) which provides a RECAP standard (RS) derived for non-industrial and industrial exposure scenarios using currently recommended default exposure parameters and toxicity values. Under MO-1, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-1 limiting RS, then the Permittee may; (1) remediate to the MO-1 limiting RS (and comply with closure/post closure requirements for MO-1), or (2) proceed with a MO-2 or MO-3 evaluation.

VIII.A.3.c. Management Option 2

The Permittee shall use Management Option 2 (MO-2) which provides for the development of soil and groundwater RS using site-specific data with specified analytical models to evaluate constituent fate and transport at the AOI. The results of this evaluation shall be used in conjunction with standard reasonable maximum exposure (RME) assumptions to identify site-specific MO-2 RS. Under MO-2, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-2 limiting RS, then the Permittee may; (1) remediate to the MO-2 limiting RS (and comply with closure/post closure requirements for MO-2), or (2) proceed with a MO-3 evaluation.

VIII.A.3.d. Management Option 3

The Permittee shall use Management Option 3 (MO-3) which provides the option of using site-specific data for the evaluation of exposure and the evaluation of environmental fate and transport at the AOI. The results of the site-specific evaluation may be to develop site-specific MO-3 RS. Under MO-3, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-3 limiting RS, then the Permittee shall; (1) remediate to the MO-3 RS, (2) conduct confirmatory sampling, and (3) comply with closure/post closure requirements for MO-3.

VIII.A.4. Corrective Action for Releases Beyond Facility Boundary

Section 3004(v) of RCRA as amended by HSWA, and State regulations promulgated as LAC 33:V.3322.C require corrective actions beyond the facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied.

VIII.A.5. Financial Responsibility

Assurances of financial responsibility for corrective action shall be provided by the Permittee as specified in the Permit following major modification for remedy selection. The Administrative Authority reserves the right to require financial assurance prior to remedy selection based upon facility compliance history, the extent and degree of contamination, financial health of the Permittee, and input from the public.

VIII.A.6. Summary of Corrective Action Activities

A summary of the corrective action activities associated with the facility is provided in Condition VIII, Appendix 1 of this permit. AOCs and SWMUs that are currently being managed or proposed for management under a prescribed corrective action program (e.g., groundwater order, corrective action order, CERCLA) are identified in Condition VIII, Appendix 1, Table 1 of this permit.

VIII.A.7. Approval of Alternate Schedule

The Permittee may submit a written request for an alternate schedule for a submittal deadline as presented in Condition VIII, Table 1. The request should propose a specific alternate schedule and include an explanation as to why the alternate schedule is necessary. The Administrative Authority will consider site-specific criteria in either approving or disapproving the request for an alternate schedule.

VIII.B. PROJECT DEVELOPMENT AND SCOPING MEETING

VIII.B.1. Notice of Intent

The Permittee must submit to the Administrative Authority a Notice of Intent to conduct corrective action using the CAS within sixty (60) days of the confirmation of newly discovered contamination. The notice of intent should state the following:

VIII.B.1.a. General information regarding facility location;

VIII.B.1.b. General information regarding the facility's operational history;

VIII.B.1.c. General discussion on how the Permittee will proceed through the CAS;

VIII.B.1.d. Brief description of proposed performance standards for corrective action; and

VIII.B.1.e. Propose a date for a scoping meeting between the Permittee and the Administrative Authority to be held within sixty (60) days of the date of the Notice of Intent.

VIII.B.2. Scoping Meeting

The scoping meeting will serve as the first CAS milestone where the Permittee and the Administrative Authority identify expectations concerning CAS implementation. The length and extent of the meeting will depend on the complexity of the site. Agreements on land use, groundwater classification, the level of detail required in the conceptual site model (see Condition VIII.D) and expectations for remediation goals will be discussed during the scoping meeting(s). During the scoping meeting the Permittee will present the following information to the Administrative Authority:

VIII.B.2.a. A conceptual site model (if one already has been developed);

VIII.B.2.b. Discussions on history of corrective action at the facility, including facility investigations, risk evaluations or risk assessments, interim measure/stabilizations and final remedies implemented;

VIII.B.2.c. Proposed performance standards for the facility with justification, and potential risk management approaches;

VIII.B.2.d. Discussions on how the Permittee plans to use the CAS to meet its corrective action obligations, including permitting and compliance issues;

VIII.B.2.e. A Communication Strategy Plan that specifies where in the CAS process the Permittee is currently and how the Permittee will provide information about future progress at the facility to the Administrative Authority (i.e., progress reports, conference calls, routine meetings, etc.);

VIII.B.2.f. Site-specific concerns (i.e., sensitive environments or special subpopulations);

VIII.B.2.g. Need for interim measures or stabilization activities, if necessary; and

VIII.B.2.h. Schedule for submittal of the CAS Investigation Workplan and proposed schedule for conducting and completing CAS requirements, including public participation.

Information plans and reports that have already been developed by the Permittee during the corrective action process can be referenced during the scoping meeting. The Permittee must coordinate with the Administrative Authority in order to determine the date, time, and location of the scoping meeting.

VIII.C. REPORTING REQUIREMENTS

VIII.C.1. The Permittee shall submit, in accordance with Condition VII.A.8, signed reports of all activities conducted pursuant to the provisions of this Permit as required by the Administrative Authority. The reporting schedule shall be determined on a case-by-case basis by the Administrative Authority. These reports shall contain, as applicable to the stage of corrective action, the information required by CAS, as well as the following:

VIII.C.1.a. A description of the work completed and an estimate of the percentage of work completed;

VIII.C.1.b. Summaries of all findings, including summaries of laboratory data;

VIII.C.1.c. Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems;

VIII.C.1.d. Projected work for the next reporting period;

VIII.C.1.e. Summaries of contacts pertaining to corrective action or environmental matters with representatives of the local community, public interest groups or State government during the reporting period;

VIII.C.1.f. Changes in key project personnel during the reporting period; and

VIII.C.1.g. Summaries of all changes made in implementation during the reporting period.

VIII.C.2. Copies of other reports relating to or having bearing upon the corrective action work (e.g., inspection reports, drilling logs and laboratory data) shall be made available to the Administrative Authority upon request.

VIII.C.3. In addition to the written reports as required in Condition VIII.C.1 and VIII.C.2 above, at the request of the Administrative Authority, the Permittee shall provide status review through briefings with the Administrative Authority.

VIII.C.4. The determination and approval of remedy selections, schedules of submittals and minor changes to any corrective action workplans may be made by the Administrative Authority during the scoping meeting or status review briefings as described in Condition VIII.C.3.

VIII.D. SPECIFIC CONDITION – CONCEPTUAL SITE MODEL (CSM)

No later than 120 days after the scoping meeting, the Permittee shall submit to the Administrative Authority a CSM (along with the Performance Standards detailed in Condition VIII.A.2) or an update of any CSM submitted at the scoping meeting providing background information and the current conditions at the facility. The level of detail required for the CSM will be discussed during the scoping meeting. At a minimum, the CSM must address current site conditions, land use, known and/or potential constituent source(s), routes of constituent migration, exposure media (i.e., soil, surface waters, groundwater), exposure points, points of compliance and pathways, receptors and source media to be evaluated under the RECAP. The CSM must include a completed Figure 8 (LAC 33:I.Chapter 13). The Permittee may include completed investigations, existing data, or previously submitted documents in the CSM by reference. References must include the names, dates, and brief summaries of the documents.

If a CSM has been previously developed, the scoping meeting will also provide the opportunity for the Permittee and Administrative Authority to consider and identify all data gaps in the CSM. The initial CSM shall be considered the "base document" to be prepared and updated by the facility as new information is gathered during investigations. The CSM shall be used by the facility to make decisions regarding risk management options, ecological

risk, and monitored natural attenuation determinations (RECAP Section 2.16), or technical impracticability (TI) waiver determinations, when appropriate.

The Administrative Authority reserves the right to require revisions to the CSM based upon data resulting from ongoing investigations and activities. Revisions to the CSM may also be required for newly identified SWMUs or AOCs according to Condition VIII.L of this permit (See Appendix 1, Ongoing Corrective Action) and based on new information and information not previously considered by the Administrative Authority.

The CSM shall be divided into Profiles as detailed in Conditions VIII.D.1 through 6. If the Permittee chooses to use existing data and documents in the CSM, it may not be necessary to prepare the Profiles as detailed in Conditions VIII.D.1 through 6. However, the existing documents and data must provide sufficient information and detail which corresponds to the information required by the Facility, Land Use and Exposure, Physical, Release, Ecological, and Risk Management Profiles.

VIII.D.1. Facility Profile

The Permittee shall include in the CSM a Facility Profile which shall summarize the regional location, pertinent boundary features, general facility structures, process areas, and locations of solid waste management units or other potential sources of contaminant migration from the routine and systematic releases of hazardous constituents to the environment (e.g., truck or railcar loading/unloading areas). The Permittee shall also include historical features that may be potential release areas because of past management practices. The Facility Profile shall include:

VIII.D.1.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.1.a.(1) General geographic location;

VIII.D.1.a.(2) Property lines with the owners of all adjacent property clearly indicated;

VIII.D.1.a.(3) Facility structures, process areas and maintenance areas;

VIII.D.1.a.(4) Any other potential release areas shall be delineated, such as railcar loading/unloading areas or any other AOI as described in RECAP Section 2.6; and

VIII.D.1.a.(5) Locations of historical features that may be potential release areas or any areas of past solid and hazardous waste generation, treatment, storage or disposal activities.

VIII.D.1.b. The Facility Profile shall also include a description of ownership and operation of the facility.

VIII.D.1.c. The Permittee shall provide pertinent information for those spills that have not been asse ssed and reported to the Administrative Authority during facility investigations, addressed by facility spill contingency plans, or previously remediated or deemed for no further action. The information must include at minimum, approximate dates or periods of past waste spills, identification of the materials spilled, the amount spilled, the location where spilled, and a description of the response actions conducted (local, state, federal, or private party response units), including any inspection reports or technical reports generated as a result of the response.

VIII.D.2. Land Use and Exposure Profile

The Permittee shall include in the CSM a Land Use and Exposure Profile which includes surrounding land uses (industrial and non-industrial, as described in RECAP Sections 2.9.1 and 2.9.2), resource use locations (water supply wells, surface water intakes, etc.), beneficial resource determinations (groundwater classifications as described in RECAP Section 2.10), natural resources (wetlands, etc.), sensitive subpopulation types and locations (schools, hospitals, nursing homes, day care centers, etc.), applicable exposure scenarios, and applicable exposure pathways identifying the specific sources, releases, migration mechanisms, exposure media, exposure routes and receptors. The Land Use and Exposure Profile shall include:

VIII.D.2.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.2.a.(1) Surrounding land uses, resource use locations, and natural resources/wetlands;

VIII.D.2.a.(2) Locations of sensitive subpopulations; and

VIII.D.2.a.(3) An exposure pathway flowchart which outlines sources, migration pathways, exposure media and potential receptors as depicted in Figure 8 (CMS cxamplc) of thc RECAP.

VIII.D.3. Physical Profile

The Permittee shall include in the CSM a Physical Profile which shall describe the factors that may affect releases, fate and transport, and receptors, including; topography, surface water features, geology, and hydrogeology. The Physical Profile shall include:

VIII.D.3.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V.Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.3.a.(1) Topographic maps with a contour interval of five (5) or ten (10) feet, a scale of one inch to 100 feet (1:100), including hills, gradients, and surface vegetation or pavement;

VIII.D.3.a.(2) Surface water features including routes of all drainage ditches, waterways, direction of flow, and how they migrate to other surface water bodies such as canals and lakes;

VIII.D.3.a.(3) Regional geology including faulting and recharge areas, as well as local geology depicting surface features such as soil types, outcrops, faulting, and other surface features;

VIII.D.3.a.(4) Subsurface geology including stratigraphy, continuity (locations of facies changes, if known), faulting and other characteristics;

VIII.D.3.a.(5) Maps with hydrogeologic information identifying water-bearing zones, hydrologic parameters such as transmissivity, and conductivity. Also locations and thicknesses of aquitards or impermeable strata; and

VIII.D.3.a.(6) Locations of soil borings and production and groundwater monitoring wells, including well log information, and construction of cross-sections which correlate substrata. Wells shall be clearly labeled with ground and top of casing elevations (can be applied as an attachment).

VIII.D.4. Release Profile

The Permittee shall include in the CSM a Release Profile which shall describe the known extent of contaminants in the environment, including sources, contaminants of concern (COC), areas of investigations, distribution and magnitude of known COCs with corresponding sampling locations, and results of fate and transport modeling depicting potential future extent/magnitude of COCs. The Release Profile shall include:

VIII.D.4.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V. Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.4.a.(1) Estimations of source concentrations, exposure concentrations and compliance concentrations for each affected media as defined in Section 2.8 of RECAP;

VIII.D.4.a.(2) Isopleth maps depicting lateral extent and concentrations of COCs;

VIII.D.4.a.(3) Results of fate and transport modeling showing potential exposure concentrations and locations; and

VIII.D.4.a.(4) Locations of potential sources including past or present waste units or disposal areas and all SWMUs/AOCs.

VIII.D.4.b. Table(s) depicting the following information for each SWMU/AOC, including but not limited to: location; type of unit/disposal/release area; design features; operating practices (past and present); period of operation; age of unit/disposal/release area; general physical condition; and method of closure.

VIII.D.4.c. Table(s) depicting the following waste/contaminant characteristics for those areas referenced in Condition VIII.D.4.b, including but not limited to: type of waste placed in the unit (hazardous classification, quantity, chemical composition), physical and chemical characteristics (physical form, description, temperature, pH, general chemical class, molecular weight, density, boiling point, viscosity, solubility in water, solubility in solvents, cohesiveness, vapor pressure); and migration and dispersal characteristics of the waste (sorption coefficients, biodegradability, photodegradation rates, hydrolysis rates, chemical transformations).

VIII.D.5. Ecological Profile

The Permittee shall include in the CSM an Ecological Profile that shall describe the physical relationship between the developed and undeveloped portions of the facility, the use and level of disturbance of the undeveloped property, and the type of ecological receptors present in relation to completed exposure pathways. When compiling data for the Ecological Profile, current, as well as, future impacts to receptors and/or their habitats shall be considered. The Ecological Profile shall include:

VIII.D.5.a. A history and description of the developed property on the facility, including structures, process areas, waste management units, and property boundaries;

VIII.D.5.b. A history and description of the undeveloped property, including habitat type (wetland, grassy area, forest, ponds, etc.). Include a description of the primary use, degree and nature of any disturbance, along with proximity to drainage ditches, waterways and landfill areas;

VIII.D.5.c. A description of the site receptors in relation to habitat type, including endangered or protected species, mammals, birds, fish, etc.;

VIII.D.5.d. A description of the relationship between release areas and habitat areas, specifically relating chemicals of potential ecological concern (COEC) to ecological receptors;

VIII.D.5.e. An ecological checklist as described in Section 7.0 of RECAP. An ecological checklist (presented in Appendix C, Form 18 of the RECAP) shall be used to determine if a tier 1 (screening level) Ecological Risk Assessment (ERA) is warranted.

VIII.D.6. Risk Management Profile

The Permittee shall include in the CSM a Risk Management Profile that shall describe how each AOI at the facility will be managed for the protection of human health and the environment. The Risk Management Profile will serve as documentation of the results of the site ranking system (described in Section 2.2 of RECAP). The Risk Management Profile will also document the criteria and verify that the SO, MO-1, MO-2 or MO-3 is appropriate for application at each AOI. The Risk Management Profile shall include:

VIII.D.6.a. A table for tracking the management options for each AOI, and the determination made, whether an AOI is deemed for no further action at this time (NFA-ATT) or is going to use either the SO, MO-1, MO-2 or MO-3 management option.

VIII.D.6.b. A list of identified site-wide data gaps for further investigation.

VIII.D.6.c. Documentation of all interim measures which have been or are being undertaken at the facility, including under State or Federal compliance orders, other than those specified in the Permit. This documentation shall include the objectives of the interim measures and how the measure is mitigating a potential threat to human health or the environment and/or is consistent with and integrated into requirements for a long term remedial solution.

VIII.E. INTERIM MEASURES

VIII.E.1. If at any time during the term of this Permit, the Administrative Authority determines that a release or potential release of hazardous constituents from a SWMU/AOC poses a threat to human health and the environment, the Administrative Authority may require interim measures. The Administrative Authority shall determine the specific measure(s) or require the Permittee to propose a measure(s). The interim measure(s) may include a permit modification, a schedule for implementation, and an Interim Measures Workplan. The Administrative Authority may modify this Permit according to LAC 33:V.321 to incorporate interim measures

into the Permit. However, depending upon the nature of the interim measures, a permit modification may not be required.

VIII.E.2. The Permittee may propose interim measures at any time by submittal of an Interim Measures Workplan subject to the approval of the Administrative Authority.

VIII.E.3. The Administrative Authority shall notify the Permittee in writing of the requirement to perform interim measures and may require the submittal of an Interim Measures Workplan. The following factors will be considered by the Administrative Authority in determining the need for interim measures and the need for permit modification:

VIII.E.3.a. Time required to develop and implement a final remedy;

VIII.E.3.b. Actual and potential exposure to human and environmental receptors;

VIII.E.3.c. Actual and potential contamination of drinking water supplies and sensitive ecosystems;

VIII.E.3.d. The potential for further degradation of the medium in the absence of interim measures;

VIII.E.3.e. Presence of hazardous wastes in containers that may pose a threat of release;

VIII.E.3.f. Presence and concentration of hazardous waste including hazardous constituents in soil that has the potential to migrate to ground water or surface water;

VIII.E.3.g. Weather conditions that may affect the current levels of contamination;

VIII.E.3.h. Risks of fire, explosion, or accident; and

VIII.E.3.i. Other situations that may pose threats to human health and the environment.

VIII.E.5. Upon approval of the Interim Measures Workplan and completion of the interim measure(s) implementation, the Permittee will submit a report to the Administrative Authority describing the completed work.

VIII.E.6. At anytime during or after the interim measure(s), including the issuance of an NFA-ATT, the Administrative Authority may require the Permittee to submit the SWMUs/AOCs for further corrective action.

VIII.F. CAS (CORRECTIVE ACTION STRATEGY) INVESTIGATION WORKPLAN

VIII.F.1. The CAS Investigation Workplan that describes site investigation activities for corrective action shall be submitted to the Administrative Authority within 180 days after the scoping meeting between the Permittee and the Administrative Authority. The CAS Investigation Workplan must address releases of hazardous waste or hazardous constituents to all media, unless otherwise indicated, for those SWMUs/AOCs listed in Appendix 1, Table 1. The focus of the site investigation phase for corrective action is to collect data to fill in data gaps identified in the CSM. The corrective action investigations may be conducted in phases if warranted by site conditions, contingent upon approval by the Administrative Authority.

VIII.F.1.a. The CAS Investigation Workplan shall describe the management options (MO) for each AOI/release area, data quality objectives for achieving each management option, and proposals for release characterizations (sampling and analysis/quality assurance plans) to support the data quality objectives (DQOs). (DQOs are determined based on the end use of the data to be collected, and the DQO development process should be integrated into project planning and refined throughout the CAS implementation. DQOs shall be used to 1) ensure that environmental data are scientifically valid, defensible, and of an appropriate level of quality given the intended use, and 2) expedite site investigations. The CAS Investigation Workplan is required to have DQOs that are developed to support the performance standard for each release.) The CAS Investigation Workplan shall detail all proposed activities and procedures to be conducted at the facility, the schedule for implementing and completing such investigations, the qualifications of personnel performing or directing the investigations, including contractor personnel, and the overall management of the site investigations. The scope of work for the site investigation can be found in RECAP Appendix B.

VIII.F.1.b. The CAS Investigation Workplan shall describe sampling, data collection quality assurance, data management procedures (including formats for documenting and tracking data and other results of investigations) and health and safety procedures.

VIII.F.1.c. Development of the CAS Investigation Workplan and reporting of data shall be consistent with the latest version of the following EPA and State guidance documents or the equivalent thereof:

VIII.F.1.c.(1) Guidance for the Data Quality Assessment, Practical Methods for Data Analysis. QA97 Version EPA QA/G-9. January 1998;

VIII.F.1.c.(2) Guidance for the Data Quality Objectives Process. EPA QA/G-4. September 1994;

VIII.F.1.c.(3) Data Quality Objectives Remedial Response Activities. EPA/540/G87-003. March 1987;

VIII.F.1.c.(4) Guidance on Quality Assurance Project Plans. EPA QA/G-5. February 1998;

VIII.F.1.c.(5) Interim EPA Data Requirements for Quality Assurance Project Plans. EPA Region 6, Office of Quality Assurance. May 1994;

VIII.F.1.c.(6) 29 CFR 1910.120 (b) for the elements to Health and Safety plans;

VIII.F.1.c.(7) RCRA Groundwater Monitoring: Draft Technical Guidance EPA/530-R-93-001 November 1992;

VIII.F.1.c.(8) Test Methods for Evaluating Solid Waste, Physical/Chemical Methods; SW-846, 3rd Edition. November 1992, with revisions;

VIII.F.1.c.(9) The LDEQ Handbook - **Construction of Geotechnical Boreholes and Groundwater Monitoring Systems," prepared by the LDEQ and the Louisiana Department of Transportation and Development.** This document is printed by and available from the Louisiana Department of Transportation and Development, Water Resources Section, P. O. Box 94245, Baton Rouge, Louisiana 70804-9245; and

VIII.F.1.c.(10) The LAC 33:I.Chapter 13 and Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP).

VIII.F.2. After the Permittee submits the CAS Investigation Workplan; the Administrative Authority will approve, disapprove, or otherwise modify the CAS Investigation Workplan in writing. All approved workplans become enforceable components of this Permit.

In event of disapproval (in whole or in part) of the workplan, the Administrative Authority shall specify deficiencies in writing. The Permittee shall modify the CAS Investigation Workplan to correct these within the time frame specified in the notification of disapproval by the Administrative Authority. The modified workplan shall be submitted in writing to the Administrative Authority for review. Should the Permittee take exception to all or part of the disapproval, the Permittee shall submit a written statement of the ground for the exception within fourteen (14) days of receipt of the disapproval.

VIII.F.3. The Administrative Authority shall review for approval, as part of the CAS Investigation Workplan or as a new workplan, any plans developed pursuant to

Condition VIII.L addressing further investigations of newly-identified SWMUs/AOCs, or Condition VIII.M addressing new releases from previously-identified SWMUs/AOCs.

VIII.G. IMPLEMENTATION OF SITE INVESTIGATION ACTIVITIES UNDER CAS

No later than fourteen (14) days after the Permittee has received written approval from the Administrative Authority for the CAS Investigation Workplan, the Permittee shall implement the site investigation activities according to the schedules and in accordance with the approved CAS Investigation Workplan and the following:

VIII.G.1. The Permittee shall notify the Administrative Authority at least 10 working days prior to any field sampling, field-testing, or field monitoring activity required by this Permit to give LDEQ personnel the opportunity to observe investigation procedures and/or split samples.

VIII.G.2. Deviations from the approved CAS Investigation Workplan, which are necessary during implementation, must be approved by the Administrative Authority and fully documented and described in the progress reports (Condition VIII.C), RECAP Report (Condition VIII.H) and the final Risk Management Plan (Condition VIII.J).

VIII.H. RECAP REPORT

Within ninety (90) days after completion of the site investigation the Permittee shall submit a RECAP Report to the Administrative Authority for approval. The RECAP Report shall document the results of the site investigation activities, and the evaluation of the impacts from releases. The Administrative Authority will review and evaluate the report and provide the Permittee with written notification of the report's approval or a notice of deficiency. If the Administrative Authority determines the RECAP Report does not fully meet the objectives stated in the CAS Investigation Workplan (Permit Condition VIII.F), the Administrative Authority shall notify the Permittee in writing of the report's deficiencies, and specify a due date for submittal of a revised Final Report to the Administrative Authority.

VIII.H.1. The Permittee shall screen site-specific data using the appropriate RECAP standard (RS) for each AOI (depending on the MO), evaluate impacts from releases with exposure scenario evaluations, and update the Risk Management Profile of the CSM.

VIII.H.2. The report shall include, but not be limited to, the following:

VIII.H.2.a. Documentation of site investigation activities and results;

VIII.H.2.b. Evaluation of exposure scenarios to document impacts from releases;

VIII.H.2.c. Deviations from the CAS Investigation Workplan;

VIII.H.2.d. Results of screening activities using RECAP standards (RS), including SO, MO-1, MO-2, or MO-3 RS for each media;

VIII.H.2.e. The revised CSM with updated profiles which incorporate investigation and screening results; and

VIII.H.2.f. Proposed revisions to performance standards based on new information (e.g., change in land use, difference in expected receptors and/or exposure, or other differences in site conditions), if warranted.

VIII.I. REMEDIAL ALTERNATIVES STUDY

Upon completion and approval of the RECAP Report, the Permittee shall proceed with the evaluation of remedial alternatives to complete corrective action for each AOI according to the performance standards described in Condition VIII.A.2. The remedial alternatives shall be submitted to the Administrative Authority in the Remedial Alternatives Study (RAS) within ninety (90) days of the Administrative Authority's approval of the RECAP Report. In the Remedial Alternatives Study, the Permittee shall identify and evaluate various potential remedies that would meet the performance-based corrective action objectives and propose one or more specific remedies based on an evaluation of applicable data and available corrective action technologies. The RAS shall be prepared in a manner that addresses the extent and nature of the contamination at the facility.

VIII.I.1. The Permittee shall evaluate remedies for each AOI that shall:

VIII.I.1.a. attain compliance with corrective action objectives for releases of hazardous waste and/or hazardous constituents, as established in the Conceptual Site Model or in later investigations approved by the Administrative Authority;

VIII.I.1.b. control sources of releases;

VIII.I.1.c. meet acceptable waste management requirements;

VIII.I.1.d. protect human health and the environment; and

VIII.I.1.e. meet applicable statutory and regulatory requirements (as noted in Condition VIII.A.2.b).

VIII.I.2. The Permittee shall evaluate the use of presumptive remedies and innovative technologies to achieve the appropriate remedial performance standards for each AOI.

VIII.I.3. The Permittee shall review the current interim measures/ stabilization activities to evaluate if these measures meet all the criteria for final remedy.

VIII.I.4. If under certain site-specific conditions, or when it is not technically or economically feasible to attain the corrective action objectives, the Permittee may propose to use institutional controls to supplement treatment or containment-based remedial actions upon approval of the Administrative Authority (Section 2.15 of RECAP).

VIII.I.5. The RAS shall at a minimum include:

VIII.I.5.a. An evaluation of the performance reliability, ease of implementation, and the potential impacts of the potential remedies;

VIII.I.5.b. An assessment of the effectiveness of potential remedies in achieving adequate control of sources and meeting remedial performance standards;

VIII.I.5.d. An assessment of the costs of implementation for potential remedies;

VIII.I.5.e. An assessment of the time required to begin and complete the remedy;

VIII.I.5.f. An explanation of the rationale for the remedy proposed for each AOI or group of AOIs; and

VIII.I.5.g. An assessment of institutional requirements (e.g., state permit requirements that may impact remedy implementation).

VIII.I.6. The Administrative Authority will review and evaluate the RAS and provide the Permittee with written notification of the study's approval or a notice of deficiency. If the Administrative Authority determines the RAS does not fully meet the requirements detailed in Conditions VIII.I.1 through VIII.I.5, the Administrative Authority shall notify the Permittee in writing of the RAS's deficiencies, and specify a due date for submittal of a revised RAS to the Administrative Authority. In addition, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.J. RISK MANAGEMENT PLAN

Within ninety (90) days of the Administrative Authority's approval of the RAS, the remedy/remedies proposed for selection shall be documented and submitted in the Risk Management Plan. The Permittee shall propose corrective action remedies in accordance with Chapter IV of the RCRA Corrective Action Plan (Final), May 1994, OSWER Directive 9902.3-2A or as directed by the Administrative Authority.

VIII.J.1. The Risk Management Plan shall at a minimum include:

VIII.J.1.a. A summary of the remedial alternatives for each AOI and the rationale used for remedy selection;

VIII.J.1.b. The final CSM with proposed remedies, including locations of AOIs addressed by a risk management activity, COC concentrations that represent the long-term fate and transport of residual COCs and the exposure pathways affected by the risk management activity;

VIII.J.1.c. Cost estimates and implementation schedules for proposed final remedies;

VIII.J.1.d. Proposed remedy design and implementation precautions, including special technical problems, additional engineering data required, permits and regulatory requirements, property access, easements and right-of-way requirements, special health and safety requirements, and community relations activities;

VIII.J.1.e. Remedy performance criteria and monitoring:

The Permittee shall identify specific criteria (such as land use changes, fate and transport model verification and constructed remedy performance) that will be evaluated to demonstrate that the risk management activity implemented will remain protective. A schedule for periodic performance review (such as monitoring data summaries, including graphical and statistical analyses) shall be established to demonstrate that the implemented activities are consistently achieving and maintaining desired results. Further, a mechanism shall be established to re-evaluate risk management activities in the event the implemented action does not achieve and maintain the performance standards;

VIII.J.1.f. Contingency plans; and

VIII.J.1.g. Description and schedules for performance reviews.

VIII.J.2. After the Permittee submits the Risk Management Plan, the Administrative Authority will review and evaluate the plan and subsequently either inform the Permittee in writing that the plan is acceptable for public review or issue a notice of deficiency.

VIII.J.3. If the Administrative Authority determines the Risk Management Plan does not fully meet the remedial objectives, the Administrative Authority shall notify the Permittee in writing of the plan's deficiencies and specify a due date for submittal of a revised Final Risk Management Plan. In addition, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.J.4. After the Administrative Authority has determined the Risk Management Plan is acceptable for public review, the Administrative Authority shall inform the Permittee in writing and instruct the Permittee to submit the plan as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

VIII.J.5. After conclusion of a 60-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the 60-day comment period.

VIII.J.6. If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.3 of this permit.

VIII.J.7. If, after considering all public comments, the Administrative Authority determines that the Risk Management Plan is adequate and complete, the Administrative Authority will issue a public notice for final approval the Class 3 permit modification. The resultant modified permit will include schedules for remedy implementation as well as financial assurance provisions as required by Condition VIII.A.5 of this permit.

VIII.K. DETERMINATION OF NO FURTHER ACTION

VIII.K.1. NFA-ATT DETERMINATIONS FOR SPECIFIC SWMUs/AOCs

VIII.K.1.a. Based on the results of the site investigations, screening, risk evaluations and risk management activities, the Permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1^{1} permit modification (^{1} requiring Administrative Authority approval) request under LAC 33:V.321.C.1. The NFA-ATT request must contain information demonstrating that there are no releases of hazardous constituents from a particular SWMU/AOC that pose a threat to human health and/or the environment.

The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used.

VIII.K.1.b. If, based upon review of the Permittee's request for a permit modification, the results of the site investigations, and other information the Administrative Authority determines that releases or suspected releases from an individual SWMU/AOC which were investigated either are non-existent or do not pose a threat to human health and/or the environment, the Administrative Authority may grant the requested modification.

VIII.K.1.c. In accordance with LAC 33:V.321.C.1.a.ii, the Permittee must notify the facility mailing list within ninety (90) days of the Administrative Authority's approval of the Class 1[1] permit modification ([1] requiring Administrative Authority approval) request.

VIII.K.2. FACILITY-WIDE NFA-ATT DETERMINATION

VIII.K.2.a. Upon the completion of all activities specified in the Risk Management Plan and after all SWMUs and AOCs at the facility have been remediated according to the standards dictated by the selected RECAP MO, the Permittee shall submit a summary report supporting a determination of NFA-ATT on a facility-wide basis.

VIII.K.2.b. The summary report must include a historical narrative for each SWMU/AOC at the site that includes a summary of the investigation, sampling & analysis, remedial, and confirmatory sampling activities leading to the NFA-ATT request. The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used. The facility-wide NFA-ATT determination must consider any newly-identified SWMUs/AOCs discovered after submittal of the Risk Management Plan.

VIII.K.2.c. The Administrative Authority will review and evaluate the summary report and subsequently either inform the Permittee in writing that the report is acceptable for public review or issue a notice of deficiency.

VIII.K.2.d. If the Administrative Authority determines the summary report does not fully demonstrate that all remedial objectives have been satisfied, the Administrative Authority shall notify the Permittee in writing of the summary report's deficiencies and specify a due date for submittal of a revised summary report.

VIII.K.2.e. After the Administrative Authority has determined the facility-wide NFA-ATT summary report is acceptable for public review, the Administrative Authority shall inform the Permittee in writing and instruct the Permittee to submit the summary report as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

VIII.K.2.f. After conclusion of a 60-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the 60-day comment period.

VIII.K.2.g. If, based upon review of the Permittee's Class 3 permit modification request, the results of the site investigations, confirmatory sampling, and other pertinent information, the Administrative Authority determines that all SWMUs and AOCs have been remediated to the selected

MO and no further action at the facility is warranted, the Administrative Authority will grant the modification request.

VIII.K.2.h. If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.4 of this permit.

VIII.K.2.i. If, after considering all public comments, the Administrative Authority determines that all activities specified in the Risk Management Plan have been completed and that all SWMUs and AOCs have been remediated to the selected MO, the Class 3 permit modification for facility-wide NFA-ATT will receive final approval. The CAS permit conditions will remain a part of the modified permit in the event that the remedial actions taken fail to maintain the established performance standard and to address any SWMUs/AOCs discovered at a later date.

VIII.K.3. CONTINUED MONITORING

If necessary to protect human health and/or the environment, a determination of NFA-ATT shall not preclude the Administrative Authority from requiring continued monitoring of air, soil, groundwater, or surface water, when site-specific circumstances indicate that releases of hazardous waste or hazardous constituents are likely to occur.

VIII.K.4. ADDITIONAL INVESTIGATIONS

A determination of NFA-ATT shall not preclude the Administrative Authority from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU/AOC at the facility that is likely to pose a threat to human health and/or the environment. In such a case, the Administrative Authority shall initiate a modification to the Permit according to LAC 33:V.321.

VIII.L. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SWMUs AND POTENTIAL AOCs

VIII.L.1. The Permittee shall notify the Administrative Authority, in writing, of any newly-identified SWMUs and potential AOCs (i.e., a unit or area not specifically identified during previous corrective action assessments, RFA, etc.), discovered in the course of ground water monitoring, field investigations, environmental audits, or other means, no later than thirty (30) days after discovery. The Permittee shall also notify the Administrative Authority of any newly-constructed land-based SWMUs (including but not limited to, surface impoundments, waste piles, landfills, land treatment units) and newly-constructed SWMUs where any release of hazardous constituents may be difficult to identify (e.g., underground storage tanks) no later

than thirty (30) days after construction. The notification shall include the following items, to the extent available:

VIII.L.1.a. The location of the newly-identified SWMU or potential AOC on the topographic map required under LAC 33:V.517.B. Indicate all existing units (in relation to other SWMUs/AOCs);

VIII.L.1.b. The type and function of the unit;

VIII.L.1.c. The general dimensions, capacities, and structural description of the unit (supply any available drawings);

VIII.L.1.d. The period during which the unit was operated;

VIII.L.1.e. The specifics, to the extent available, on all wastes that have been or are being managed at the SWMU or potential AOC; and

VIII.L.1.f. Results of any sampling and analysis required for the purpose of determining whether releases of hazardous waste including hazardous constituents have occurred, are occurring, or are likely to occur from the SWMU/AOC.

VIII.L.2. Based on the information provided in the notification, the Administrative Authority will determine whether or not the area is a newly-identified SWMU or AOC. If the area is determined to be a newly-identified SWMU or AOC, the Administrative Authority will inform the Permittee in writing and request that the Permittee submit a Class 1[1] permit modification ([1] requiring Administrative Authority approval) request under LAC 33:V.321.C.1 to add the newly-identified SWMU/AOC to Appendix 1, Table 1 of this permit.

Further, the Administrative Authority will determine the need for further investigations or corrective measures at any newly identified SWMU or AOC. If the Administrative Authority determines that such investigations are needed, the Administrative Authority may require the Permittee to prepare a plan for such investigations. The plan for investigation of SWMU or AOC will be reviewed for approval as part of the current CAS Investigation Workplan or a new CAS Investigation Workplan. The results of the investigation of any newly-discovered SWMU/AOC shall be incorporated into the CSM.

VIII.M. NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED RELEASES AT A SWMU OR AOC

The Permittee shall notify the Administrative Authority of any release(s) from a SWMU or AOC of hazardous waste or hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other means. The notification must be in accordance with the procedures specified in Conditions II.E.16 through II.E.20 of this permit and based upon the nature, extent, and severity of the release.

Such newly-discovered releases may be from newly-identified SWMUs or AOCs, newly-constructed SWMUs, or from SWMUs or AOCs for which, based on the findings of the CSM, completed RECAP Report, or investigation of an AOC, the Administrative Authority had previously determined no further investigation was necessary. The notification shall include information concerning actual and/or potential impacts beyond the facility boundary and on human health and the environment, if available at the time of the notification.

The Administrative Authority may require further investigation and/or interim measures for the newly-identified release(s), and may require the Permittee to prepare a plan for the investigation and/or interim measure. The plan will be reviewed for approval as part of the CAS Investigation Workplan or a new CAS Investigation Workplan. The Permit will be modified to incorporate the investigation, according to the Class 1[1] permit modification ([1] requiring Administrative Authority approval) procedures under LAC 33:V.321. The results of the investigation of any newly-identified release(s) shall be incorporated into the CSM.

VIII.N. PUBLIC PARTICIPATION REQUIREMENTS

Public participation is an essential element in the implementation of any corrective action program at the facility. The CAS promotes the early and continued involvement of stakeholders in site remediation activity during permit issuance, renewal, or modification. The public is invited to review and comment on the corrective action requirements contained in any draft permitting decisions or draft permit modification documents and the associated plans and reports submitted by the Permittee. The Administrative Authority reserves the right to require more extensive public participation requirements based upon site-specific conditions and other relevant factors (e.g., compliance history, potential offsite impact, community interest, etc.). At a minimum, the public participation requirements shall include the following.

VIII.N.1. NFA-ATT Determinations for Specific SWMUs/AOCs

Based on the results of the site investigations, screening, risk evaluations and risk management activities, the Permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1[1] permit modification request ([1] requiring Administrative Authority approval) under LAC 33:V.321.C.1. The Permittee must notify the facility mailing list within 90 days of the Administrative Authority's approval of the Class 1[1] permit modification request, in accordance with LAC 33:V.321.C.1.a.ii and Condition VIII.K.1.c of this permit.

VIII.N.2. Draft Permitting Decision

The public may review and comment on the terms and conditions of the CAS during the public notice and comment period of the draft permitting decision. The Administrative Authority shall issue public notice upon preparation of the draft permitting decision in accordance with LAC 33:V.715. During the forty-five (45) day public comment period, the Administrative Authority will accept public comments on the draft permitting decision. At the end of the public comment period, the Administrative Authority will consider and address all public comments and make

any necessary revisions to the draft permitting decision. After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permitting decision. The final permitting decision will include a "Responsiveness Summary" detailing all comments received on the draft permitting decision and the actions taken (if necessary) to correct the draft before issuance of the final permitting decision.

VIII.N.3. Final Remedy Selection

The public may review and comment on the terms and conditions of the Risk Management Plan as described in Conditions VIII.J.4 through VIII.J.7 of this permit. If after addressing all public comments the Administrative Authority determines that the Risk Management Plan is satisfactory, the Administrative Authority will prepare a draft permit modification document in accordance with LAC 33:V.703.C.

The draft permit modification document will include a "Basis of Decision". The "Basis of Decision" will identify the proposed remedy for corrective action at the site and the reasons for its selection, describe all other remedies that were considered, and solicit for public review and comments on the Risk Management Plan included in the draft permit modification document.

After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permit modification. The final permit modification will include a "Responsiveness Summary" detailing all comments received on the draft permit modification and the actions taken (if necessary) to correct the draft before issuance of the final permit modification.

VIII.N.4. Facility-Wide NFA-ATT

Upon the completion of all activities specified in the Risk Management Plan and after all facility remedial objectives have been met, the Permittee may submit a summary report for a determination of NFA-ATT on a facility-wide basis in accordance with Condition VIII.K.2 of this permit. The public may review and comment on the summary report as described in Condition VIII.K.2.b. If after addressing all public comments the Administrative Authority determines that all SWMUs and AOCs have been remediated to the selected MO and no further action at the facility is warranted, the Administrative Authority will prepare a draft permit modification document in accordance with LAC 33:V.703.C.

The draft permit modification document will include a "Basis of Decision". The "Basis of Decision" will provide a summary detailing contamination sources, site investigations, the MO selected for the facility, facility remedial standards, remedial actions, and sampling results demonstrating that the facility remedial standards have been achieved.

After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permit modification. The final permit

modification will include a "Responsiveness Summary" detailing all comments received on the draft permit modification and the actions taken (if necessary) to correct the draft before issuance of the final permit modification.

Table 1: Corrective Action Strategy Notification and Reporting Requirements

Below is a summary of the major notifications and reports that may be required by the Administrative Authority under the Corrective Action Strategy of this Permit in the event of releases requiring RCRA corrective action. The Administrative Authority will notify the Permittee of the notification and reporting requirements during the scoping meeting or another applicable stage of the corrective action process. Currently, there are no active AOC/SWMUs under corrective action at the Baton Rouge Facility (see Appendix 1).

ACTION	DUE DATE
Submit Notice of Intent to request use of the CAS to the Administrative Authority for review and comment (Condition VIII.B.1)	Within sixty (60) days of newly discovered contamination
CAS Scoping Meeting held between facility and Administrative Authority (Condition VIII.B.2)	Within sixty (60) days of submittal of the Notice of Intent
Submit Progress Reports on all activities to the Administrative Authority (Condition VIII.C.1)	Schedule to be determined by the Administrative Authority on a case-by-case basis
Make available other reports relating to corrective action to the Administrative Authority (Condition VIII.C.2)	Upon request of the Administrative Authority
Provide briefings to the Administrative Authority (Condition VIII.C.3)	As necessary and upon request by the Administrative Authority
Submit Conceptual Site Model (CSM) (Condition VIII.D) and facility Performance Standards (Condition VIII.A.2) to the Administrative Authority	Within one-hundred and twenty (120) days after the scoping meeting
Perform Interim Measures (Condition VIII.E)	As determined by the Administrative Authority on a case by case basis
Submit Corrective Action Strategy (CAS) Workplan for the facility investigation to the Administrative Authority (Condition VIII.F)	Within one-hundred and eighty (180) days after the CAS Scoping Meeting
Implement site investigation activities under CAS Investigation Workplan according to approved schedule (Condition VIII.G)	Within fourteen (14) days of receipt of approval by the Administrative Authority
Submit RECAP Report to the Administrative Authority (Condition VIII.H)	Within ninety (90) days of completion of the site investigation
Submittal of Remedial Alternatives Study (RAS) to the Administrative Authority (Condition VIII.I)	Within ninety (90) days of completion of approval of the RECAP Report by the Administrative Authority
Submit Risk Management Plan to the Administrative Authority (Condition VIII.J)	Within sixty (90) days of approval of the RAS by the Administrative Authority

Submit requests for unit specific and facility-wide NFA-ATT determinations to the Administrative Authority (Condition VIII.K)	As necessary
Notification of newly-identified SWMUs and potential AOCs (Condition VIII.L)	Thirty (30) days after discovery
Notification of newly-discovered releases (Condition VIII.M)	According to the requirements of Conditions II.E.16 through II.E.20 of this permit

APPENDIX 1: SUMMARY OF CORRECTIVE ACTION ACTIVITIES

Rhodia Inc., obtained the first operating permit for the Baton Rouge Facility effective January 28, 1989. The operating permit was issued with HSWA provisions addressing site-wide corrective action at the Baton Rouge Facility. The permit listed the SWMUs described in Table 1, Summary of Corrective Action Activities. The permit required the submittal of an RFI report, dated July 15, 1992, addressing all the SWMUs listed with the exception of Impoundment 001. The permittee responded to comments on April 4, 1997 which were then reviewed by the Department. The Department approved the RFI report and concurred that no further action was required at the SWMUs contained in Appendix 1, Table 1, Summary of Corrective Action Activities. Impoundment 001 was a RCRA regulated treatment, storage and disposal facility. The Impoundment 001 was certified closed by the Department on December 24, 2003. Thus, Rhodia does not have AOC/SWMUs requiring corrective action at the Baton Rouge Facility. However, in the event new AOC/SWMUs are discovered Appendix 1, Table 1, Summary of Corrective Activities will be modified in accordance with condition VIII.M.

TABLE 1. SUMMARY OF CORRECTIVE ACTION ACTIVITIES

AOC or SWMU Number/Area Name	*AOC/SWMU Description*	*Status of CA Activity*	*Corrective Action*	*EDMS[1] Document ID #/ Approval Date*
SWMU 1	Quench Tower Hopper No. 1	NFA-ATT	Completed	12534823
SWMU 2	Quench Tower Hopper No. 2	NFA-ATT	Completed	12534823
SWMU 3	WTP Pond 002 Surface Impoundment	NFA-ATT	Completed	12534823
SWMU 4	Sulfuric Acid Pit Surface Impoundment	NFA-ATT	Completed	12534823
SWMU 5	Leak Detection Sump No. 1	NFA-ATT	Completed	12534823
SWMU 6	Leak Detection Sump No. 2	NFA-ATT	Completed	12534823
SWMU 7	Sludge Hopper	NFA-ATT	Completed	12534823
SWMU 8	pH Check Tank (T-916)	NFA-ATT	Completed	12534823
SWMU 9	pH Check Tank (T-906)	NFA-ATT	Completed	12534823
SWMU 10	Attenuation Tank (T-907)	NFA-ATT	Completed	12534823
SWMU 11	Landfill No. 1	NFA-ATT	Completed	12534823
RFI Area No. 1	Vacuum Filter and Solids Accumulation Pad	NFA-ATT	Completed	12534823
RFI Area No. 2	Tanks 28 & 29, Tank farm and Truck Unloading Pad	NFA-ATT	Completed	12534823
Impoundment 001	RCRA TSD (Closure Certification)	Closed	Completed	30231861

[1] EDMS – LDEQ's Electronic Document Management System

ATTACHMENT 1

ATTACHMENT 1
LIST OF FACILITY DOCUMENTS INCORPORATED IN THE PERMIT BY REFERENCE
LAD008161234
AI#1314

DOCUMENT TYPE	APPLICATION /DOCUMENT DATE	ELECTRONIC DATABASE MANAGEMENT SYSTEM (EDMS) DOCUMENT ID	COMMENTS
Arrangement with local authorities	10/04/2007	36328303	Volume IV, Attachment 23.
Closure cost estimates	10/04/2007	36328603	Volume V, Attachment 36.
Closure Plan	10/04/2007	36328603	Volume V, Attachment 36.
Contingency Plan	10/04/2007	36328303	Volume IV, Attachment 23,
Inspection Plan	10/04/2007	36328003, 36328203	Volume I, page 31 and Volume III, Attachment 14
Security Plan	10/04/2007	36328003, 36328303	Volume I, page 22, and Volume IV, Attachment 20, Figure 11.
Personnel Training Plan	10/04/2007	36328203	Volume III, Attachment 9
Waste Analysis Plan	6/24/2008	37036749	Updated Waste Analysis Plan
Proposed Facility Modifications (Attachment 50)	10/04/2007	36328603	Volume V, Attachment 50 (Abatement Projects and Proposed Upgrades and Furnace Optimization)